EPA REG. NO. 84374-1 (VOLUME 1)

Matthew Brooks, Ph.D. 703-266-0128 Phone 703-266-4377 Fax mwbrooks01@yahoo.com

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# John Bazuin/DC/USEPA/US 03/27/2008 11:44 AM

To Matthew Brooks < mwbrooks 01@yahoo.com>

CC

bcc

Subject Re: Revised cert form

Matt.

Attached is a PDF file containing the registration letter and accepted label for 84374-1. I decided that scanning those things might be the best way to get them to you. Please let me know if this works out well for you.

John Bazuin



84374-1. registration. letter. and, accepted label. 20080327.pdf

Matthew Brooks < mwbrooks 01@yahoo.com>



Matthew Brooks <mwbrooks01@yahoo.com> 03/27/2008 09:40 AM

To John Bazuin/DC/USEPA/US@EPA, Tony Kish/DC/USEPA/US@EPA

CC

Subject Revised cert form

Hi John See attached. -Matt

Matthew Brooks, Ph.D.
703-266-0128 Phone
703-266-4377 Fax
mwbrooks01@yahoo.com[attachment "Cert from for duomax.pdf" deleted by John
Bazuin/DC/USEPA/US]



#### U.S. ENVIRONMENTAL PROTECTION AGENCY

Office of Pesticide Programs Registration Division (7505C) 1200 Pennsylvania Ave., N.W. Washington, D.C. 20460 EPA Reg. Number: Date of Issuance:

84374-1

MAR 2 7 2008

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X Registration
Reregistration

(under FIFRA, as amended)

Term of Issuance:

Conditional

Name of Pesticide Product:

Duomax

Name and Address of Registrant (include ZIP Code):

Green Trees and Plants II LLC 250 Lawrence Street Marietta, Georgia 30060

Mailed to: Matthew Brooks/Ag-Chem Consulting, Agent for Green Trees and Plants, 12208 Quinque Lane, Clifton, VA 20124

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is conditionally registered in accordance with FIFRA section 3(c)(7)(A) provided that you:

- 1. Submit and/or cite all data required for registration of your product under FIFRA Section 3(c)(5) when the Agency requires all registrants of similar products to submit such data; and submit acceptable responses required for reregistration of your product under FIFRA Section 4.
  - 2. Make the following label changes before you release the product for shipment:
    - a. Revise the EPA Registration Number to read, "EPA Reg. No. 84374-1."

b. In the Ingredient Statement change "Cynamide" to "Cyanamide".

Signature of Approving Official:

Date:

MAR 2 7 2008

Tony Kish, Product Manager (Team 22)

Fungicide Branch, Registration Division (7505P)

EPA Fonn 8570-6

- c. In the Spanish-language sentence on page 1 change "etiquette" to "etiqueta".
- d. In the Spanish-language sentence on page 1 change "detaile" to "detalle".
- e. In the "NOTES:" component of the "FIRST AID" section change "National pesticide Information Center" to "National Pesticide Information Center". Also in the "If In Eyes", change "Help eye" to "Hold eye".
- f. In the fifth sentence in the "HAZARDS TO HUMANS AND DOMESTIC ANIMALS" section on the second page change "...avoid exposure to the material or its spray drift, some people may develop a sensitivity..." to "...avoid exposure to the material or its spray drift. Some people may develop a sensitivity...".
- g. On the second page change the heading "PERSONAL, PROTECTIVE EQUIPMENT" to "PERSONAL PROTECTIVE EQUIPMENT".
- h. In the fifth bulleted item after the heading "APPLICATORS AND OTHER HANDLERS MUST WEAR:" on the second page change "...for overhear exposure." to "...for overhead exposure."
- i. In the last sentence in the second bulleted item after the heading "ENGINEERING CONTROLS STATEMENTS:" on the second page change "...may be reduced for modified as specified..." to "...may be reduced or modified as specified...".
- j. Remove the lonesome bullet at the end of the "USER SAFETY RECOMMENDA-TIONS" section near the top of the third page. Also, in the "Environmental Hazards" section add the missing NPDES statement for containers > 5 gallons (see EPA label review manual).
- k. Move the "AGRICULTURAL USE REQUIREMENTS" section (still in a box) down into the "DIRECTIONS FOR USE" section, positioning it immediately after the one-sentence paragraph which reads "Do not apply this product through any type or irrigation."
- 1. In the second bulleted item in the bottom half of the "AGRICULTURAL USE REQUIREMENTS" section change "Nitriel Rubber" to Nitrile Rubber".
- m. Change the start of the second sentence in the second paragraph after the "DIRECTIONS FOR USE" heading from "Dur4ing the application..." to "During the application...".
- n. In the first sentence in the second paragraph before the heading "EQUIPMENT CONTAMINATION" on the fourth page change "...plant growth regulator with will stimulate..." to "...plant growth regulator that will stimulate...".
- o. In the last sentence in the second paragraph before the heading "EQUIPMENT CONTAMINATION" on the fourth page change "...benefits and ow to avoid..." to "...benefits and how to avoid...".

- p. In the one-sentence immediately before the heading "EQUIPMENT CONTAMINATION" on the fourth page change "...at the time or Duomax application." to "...at the time of Duomax application."
- q. In the last sentence in the "POTENTIAL CROP LOSS" section on the fourth page change "...since sever damage and crop loss..." to "...since severe damage and crop loss...".
- r. Delete the second sentence in the second paragraph in the "SPRAY DRIFT" section (near the bottom of the fourth page). It reads "Do not exceed 40 psi for dilute boom sprayers and 100 psi for air fan sprayers, and spray only to wet." It is redundant to the previous sentence.
- s. In the first sentence in the "DORMANCY REQUIREMENTS" section on the fifth page change "To promote the maximum effective of Duomax..." to "To promote the maximum effectiveness of Duomax...".
- t. In the first sentence in the "ENVIRONMENTAL AND DISEASE STRESS" section on the fifth page change "...soils affect5ed by..." to "...soils affected by...".
- u. In the second sentence in the second sentence in the "CHERRIES" subsection on the sixth page change "polloination" to "pollination".
- v. In the second sentence in the second to last paragraph in the "DESERT GRAPES" subsection on the sixth page change "...susceptible to forst and..." to "...susceptible to frost and...".
- w. In the last sentence in the "NON-DESEART GRAPES" subsection on the seventh page change "...reduced yield is conditions..." to "...reduced yield if conditions...".
- x. In the last sentence in the "KIWI (California Only)" subsection on the seventh page change "...are susceptible to forst and may be killed..." to "...are susceptible to frost and may be killed..."
- y. In the first sentence in the "PEACHES/NECTARINES" subsection on the seventh page change "1-1.5\$ (v/v)" to "1-1.5% (v/v)".
- z. In the second sentence in first paragraph in the "PEACHES/NECTARINES" subsection on the seventh page change "...made 30 ore more days..." to "...made 30 or more days...".
- aa. In the third sentence in the first paragraph in the "PEACHES/NECTARINES" subsection on the seventh page change "...may resuld in reduced yield." to "may result in reduced yield."
- ab. In the last sentence in the third paragraph in the "PEACHES/NECTARINES" subsection near the bottom of the seventh page change "...based on a threshold temperatures of 43°F to 45°F)." to "...based on a threshold temperature of 43°F to 45°F)."

- ac. In the "STORAGE AND DISPOSAL" section move the "PROHIBITIONS:" subsection up so that it immediately follows the "STORAGE AND DISPOSAL" heading.
  - ad. Change the name of the "STORAGE:" section to "PESTICIDE STORAGE:".
- ae. In the "PROHIBITIONS:" subsection of the "STORAGE AND DISPOSAL" section move the sentence that reads "Open dumping is prohibited." to the "PESTICIDE DISPOSAL" subsection.
- af. In the "PROHIBITIONS:" subsection of the "STORAGE AND DISPOSAL" section move the sentence that reads "Keep pesticide in original container." to the "PESTICIDE STORAGE" subsection.
- ag. Change the first sentence in item 2. in the "CONDITION OF SALE" section to read as follows:

"To the extent allowed by law, because the time place, rate of application, weather conditions and normal or abnormal conditions of use or storage are beyond Green Trees and Plants' control, Green Trees and Plants' liability is limited to replacement of product or refund of purchase price."

ah. Change the second sentence in item 2. in the "CONDITION OF SALE" section to read as follows:

"To the extent allowed by law, in no event shall Green Trees and Plants be liable for indirect or consequential damages."

- 3. Submit, by no later than one year following the date of this letter, a study or studies that fulfill the requirements for Storage Stability (Guideline Requirement Number 830.6317) and Corrosion Characteristics (Guideline Requirement Number 830.6320) of the subject product.
- 4. Submit one copy of the revised final printed label for the Agency's records before you release the product for shipment.

If these conditions are not complied with, the registration will be subject to cancellation, in accordance with FIFRA section 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

Attachments: Product label stamped "ACCEPTED with COMMENTS"
Two Technical Review Branch reviews

### RESTRICTED USE PESTICIDE

Due to corrosive effects to eyes and skin.

For Retail sale to and use only by Certified Applicators or persons under their direct supervision and only for those uses covered by the Certified Applicator's Certification.

# A growth regulator for stimulating uniform budbreak:

### DUOMAX

	•			
ACTIVE INGREDIENT		BY WEIGHT	. n # % C	
Hydrogen Cynamide	***************************************	50.00%	42 ° 5 5	
, v -		50.00%		
	***************************************	100.00%	ETERE	
				:
4.3 LBS. ACTIVE INGREDIE	NT PER GALLON		LC9, 11 8 4 7	j
			F-Barret	٠
	KEEP OUT OF REACH OF CHILDREN		wy to	
	DANGER – PELIGRO	3 3 3 ,	THE RES	

Si usted no entiende la etiquette, busque a alguien para que se la explique a usted en de ail (If you do not understand this label, find someone to explain it to you in de ail.)

	FIRST AID	3,7 3
	Take off contaminated clothing	> 9 9 3
If on skin or	Rinse skin immediately with plenty of water for 15-20 minutes.	, , , , ,
clothing	Call poison control center or doctor for treatment advice.	333 9
<del> </del>	Move person to fresh air.	
If inhaled	If person is not breathing, call 911 or ambulance, then give artificial respiration, promouth-to-mouth, if possible	eferably
	Call a poison control center or doctor for further treatment advice.	
	Help eye open and rinse slowly and gently with water for 15-20 minutes.	
If in eyes	• Remove contract lenses, if present, after the first 5 minutes, then continue rinsing e	ye.
	Call a poison control center or doctor for treatment advice.	
	Call poison control center or doctor immediately for treatment advice.	
If	Have person sip a glass of water if able to swallow.	
swallowed	• Do not induce vomiting unless told to do so by a poison control center or doctor.	
•••	Do not give anything by mouth to an unconscious person.	
NOTEC		

### NOTES:

• Have the product container or label with you when calling a poison control center or doctor or going for treatment.

In the event of a medical emergency, you may also contact the National pesticide Information Center at 1-800-858-7378.

### NOTE TO PHYSICIAN

- Immediate lavage of stomach.
- Hydrogen cyanamide is not hydrogen cyanide and does not degrade to hydrogen cyanide. Do not induce vomiting or give anything by mouth to an unconscious person.

EPS REG No.

EPA EST. No

NET CONTENTS XX GALS.

# PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS DANGER

Corrosive, causes eye and skin damage. May be fatal if swallowed or absorbed through skin. Do not get in eyes, on skin or on clothing. Do not breathe spray mist. If a skin rash develops as a result of exposure to DUOMAX, avoid exposure to the material or its spray drift, some people may develop a sensitivity to DUOMAX. Avoid contamination of food and feed.

### PERSONAL, PROTECTIVE EQUIPMENT

Some materials that are chemical-resistant to this product are listed below. If you want more options, follow the instructions for category C on the EPA chemical resistance category selection chart.

# APPLICATORS AND OTHER HANDLERS MUST WEAR:

- Chemical-resistant protective suit
- Chemical-resistant gloves such as Barrier Laminate, or Butyl rubber ≥14 mils, or Nitrile Rubber ≥14 mils, or Polyvinyl Chloride (PVC) ≥14 mils, or Vitron ≥14 mils.
- Chemical-resistant footwear plus socks
- Protective eyewear persons who mix, load or transfer must wear goggles. A full-faced respirator may be substituted for goggles.
- Chemical-resistant headgear for overhear exposure
- Chemical-resistant apron when cleaning equipment, mixing, or loading
- A respirator with either an organic-vapor-removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C), or a canister approved for pesticides (MSHA.NIOSH approval number prefix TC-14G)

### **USER SAFETY REQUIREMENTS:**

- No Alcoholic beverages. Do not consume alcoholic beverages prior to, during, and following (24 hours) handling this product.
- Dispose of Contaminated Clothing. Discard clothing and other absorbent materials that have been drenched or heavily contaminated with liquid from this product. Do not reuse them,
- Clean and maintain PPE: Follow manufacturer's instructions for cleaning/maintaining PPE. If no such
  instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.
  Wash PPE after each day's use.

### **ENGINEERING CONTROLS STATEMENTS:**

- Closed Systems: This product must be mixed, loaded, and transferred only in a closed system.
- Closed Systems and Enclosed Cab Requirements (if applicable): This product must be applied only with the
  applicator in an enclosed cab. The closed system and enclosed cab must be used in a manner that meets the
  requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides {40 CFR 120.240(d)(46)}. The handler PPE requirements may be reduced for modified as specified in the WPS.
- The operating pressure of the spray rig shall be no more than 40 psi with the use of low pressure nozzles on dilute boom sprays and no more than 100 psi on airfan sprayers. Airfan sprayers should have the fan adjusted so that the spray mist does not greatly exceed the top of the vines being sprayed.

### USER SAFETY RECOMMENDATIONS

### Users should:

- Wash hands before eating drinking, chewing gum, using tobacco, or using the toilet.
- · Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.
- Avoid contact with spray contaminated surfaces.

### **ENVIRONMENTAL HAZARDS:**

Do not apply this product to any area in which an endangered species has been identified or in such a manner that drift from applications of this product could result in destroying an endangered species. This limitation applies only to areas that have been identified by and are protected by State and Federal agencies. Do not apply closer than 300 yards to the mean high water mark for intertidal areas or closer than 300 yards to surface water. Do not apply to crops growing closer than 300 yards to rivers, streams, or their flowing tributaries. Do not contaminate water by the cleaning of equipment or disposal of equipment washwater or rinsate. Do not apply when weather conditions favor drift from treated areas or where runoff is likely to occur. Do not spray when bees are active in the field.

This chemical can contaminate surface water through ground spray applications. Under some conditions it may also have a high potential for runoff into surface water after applications. These include poorly draining or wet soils with readily visible slopes toward adjacent surface waters, frequently flooded areas, areas overlaying extremely shallow ground water, areas with in-field canals or ditches that drain to surface water, areas not separated from adjacent surface waters by vegetated filter strips, and areas overlaying tile drainage systems that drain to surface water. This pesticide is highly toxic to freshwater invertebrates and moderately toxic to birds and mammals. Drift and runoff may be hazardous to aquatic organisms in neighboring areas.

### AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE), notification to workers, and restricted-entry intervals. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted entry interval (REI) of 72 hours.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil or water, is:

- Chemical-resistant protective suit
- Chemical-resistant gloves, such as Barrier Laminate, or Butyl Rubber ≥14 mils, or Nitriel Rubber ≥14 mils, or Neoprene Rubber ≥14 mils, or Polyvinyl Chloride (PVC) ≥14 mils, or Viton ≥14 mils.
- Chemical-resistant footwear plus socks
- Protective eyewear persons who mix, load or transfer must wear goggles. A full-faced respirator may
  be substituted for goggles.

Chemical-resistant headgear for overhead exposure.

Notify workers of the application by warning them orally and by posting warning signs at entrances to treated areas.

#### DIRECTIONS FOR USE

It is a violation of federal law to use this product in a manner inconsistent with its labeling.

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers or protected supervisors may be in the area during applications. Dur4ing the application no person shall be within 100 yards of the area to be treated unless involved in application or mix/load operations. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

Aerial application of Duomax is prohibited.

Do not apply this product through any type or irrigation system.

Duomax is a plant growth regulator with will stimulate more uniform budbreak on many deciduous plants. More uniform budbreak will occur in plants that have received their full chill hour requirement or somewhat less than their full dormancy. Promoting more uniform budbreak in the spring can have significant benefit in promoting more uniform flowering and more uniform maturity at harvest. The following provides directions on how to achieve these benefits and ow to avoid possible difficulties in the use or Duomax.

This label must be in possession of the user at the time or Duomax application.

**EQUIPMENT CONTAMINATION** – Spray equipment used for Duomax application should be thoroughly cleaned of residual spray materials. Residual spray in the tank or sprayer plumbing may react with Duomax, potentially reducing the effective concentration of Duomax. Sprays containing metal ions, particularly copper, will form a black insoluble salt that will coat the sprayer and be difficult to remove. More importantly, this reaction will reduce the available active ingredient concentration.

**DORMANT SPRAY EFFECTIVENESS** – Early dormant sprays containing copper should not be followed by Duomax by less than 30 days or the effect of the copper spray may be reduced.

DORMANT SPRAYS CONTAINING OIL – Dormant sprays containing oil should not be made closer than 14 days before or after Duomax application (delayed dormant applications are preferred). Some new wood dieback may result if oil is applied closer than this interval. When oil and copper spray mixtures must be used for insect and/or disease control, Duomax should be applied 30 or more days before normal budbreak and the oil and/or copper spray should be made as a delayed dormant spray, which coincides with early budbreak. This practice will give three or more weeks separation.

**COVER CROPS** - When spraying Duomax in areas of vineyards or orchards with cover crops, injury may occur from spray applications to the target crop. This injury is usually temporary, but some crops may be sensitive and be defoliated. If there is concern about the cover crop, a test spray of a small area over the cover crop to test the plant sensitivity to Duomax using the intended surfactant is recommended.

**POTENTIAL CROP LOSS** — Users of Duomax are advised that drift to crops that are in bloom may completely remove or damage all of the flowers, resulting in complete crop loss. When spraying close to susceptible crops, for example, lemons, crops in bloom, sensitive foliage, etc., a buffer zone is suggested to be used. Extreme care must be used to avoid contact of the spray or drift with foliage, green stems, or fruit of desirable crops since sever damage and crop loss may result.

SPRAY DRIFT – Avoid spraying under conditions of a temperature inversion when drift hazard is increased. Coarse sprays are less likely to drift and are recommended to be used in Duomax applications. Do not use nozzles or nozzle configurations which promote fine spray droplets. Do not increase spray volume by increasing nozzle pressure, since this will increase the number of fine droplets in the spray. It is important to understand that the responsibility for control of spray drift is the responsibility of the person making the use recommendation, the applicator and the grower. Read the "Conditions of Sale" on the Duomax label before using this product. If the terms in the "Conditions of Sale" are not acceptable, return the product unopened at once.

To limit drift, use a coarse droplet nozzle with nozzle pressure not to exceed 40 psi for dilute boom sprayers and 100 psi for air fan sprayers, and spray only to wet. Do not exceed 40 psi for dilute boom sprayers and 100 psi for air fan sprayers, and spray only to wet. Do not exceed 4 gallons per acre of Duomax per application and make only one application per crop cycle. Do not tank mix with other materials except as listed on this label. If applied less than 30 days (35 to 40 days

for apples) prior to natural budbreak, yield may be reduced. Use the minimum spray volume to achieve adequate wetting of all buds. Do not use concentrate spray.

The use of Duomax may result in the formation of ethylene gas. When the Duomax is applied to grapes growing close to certain lemon varieties the ethylene gas may in turn result in some leaf drop in lemon leaves. This defoliation is characterized by the leaf lamina falling off leaving the leaf petiole still attached to the stem. Application of lime at 125 lbs. in 250-300 gal. water per acre (having a high pH, i.e. 10+), applied 2 to 24 hours after Duomax application, may result in reduced formation of ethylene gas. Again, control of spray drift is the responsibility of the person making the use recommendation, the applicator and the grower.

PRECAUTIONS AGAINST USE OF DUOMAX AS A BLOSSOM THINNER – Duomax is not to be used as a blossom thinner under any conditions because the outcome is unpredictable.

FROST OCCURRENCE PRECAUTION – For earlier than normal budbreak, make the application sooner than 30 days prior to normal budbreak. In determining whether or not to apply Duomax to promote earlier than normal budbreak, the user should be aware that growing buds and shoots are susceptible to frost and may be killed or damaged by freezing temperatures. Following application, some yellowing on the first leaves may appear but the developing growth will be normal.

DORMANCY REQUIREMENTS – To promote the maximum effective of Duomax and to avoid phytotoxicity (i.e., new wood dieback, blossom thinning), deciduous crops must be completely dormant. Duomax is not a substitute for a lack of dormancy. Care should be taken to monitor dormancy. This is most easily accomplished by monitoring chill hour accumulation. USER NOTE: negative chill hour accumulation, climatologically induced incomplete dormancy must be considered, both to promote the effectiveness of Duomax at the recommended rates of application and to avoid phytotoxicity.

ENVIRONMENTAL AND DISEASE STRESS - Plants grown in heavy soils, or in other soils affect5ed by poor drainage, or soil borne diseases, such as phytophthora root rot may die back as a result of treatment with Duomax. This is due to increased uniform budbreak and the inability of the plant to sustain growth. Plants usually appear healthy and begin to grow normally, then collapse. Plants designated for treatment with Duomax need a healthy, viable root system. SPRAY EQUIPMENT CALIBRATION – When calibrating spray equipment, especially speed sprayers, it is critical that equipment be calibrated for the row spacing to be treated. Double spraying and excessive drift through the vineyard/orchard will result in phytotoxocity. Proper speed sprayer calibration and/or reduction of rate will provide a good result.

### **CROP RECOMMENDATIONS:**

APPLES – To promote more uniform budbreak, after all pruning activities are completed, apply a 4% (v/v) spray in not more than 200 gallons spray per acre using a nonionic surfactant not to exceed 0.5% (v/v), 30 days before normal budswell, or 35 days before normal budbreak. In orchards having more than one variety, spray according to anticipated budbreak timing of the earliest variety in an interplanted orchard, unless each variety can be sprayed separately without significant drift or overspray contacting previously sprayed varieties or nontarget varieties. When budbreak begins to occur, the bloom period can be compressed to a few days depending upon the weather. In order to assure proper pollination, a sufficient number of beehives of suitable strength to assure adequate pollination must be set in the orchard before first blossom activity is observed. Artificial pollination may be advised when bee activity is limited. Increased budbreak uniformity will also facilitate chemical thinning of fruit and promote greater uniformity of fruit maturity at harvest.

Duomax is a budbreak stimulant and will promote more uniform normal and/or earlier budbreak even when the maximum chill hour requirements are met.

Duomax is not a substitute for chill hours, however, a 4% (v/v) spray will stimulate more uniform bud emergence following a minimum amount of chilling (approximately 375-500 chill hours based on the threshold temperature of 43°F to 45°F).

BLUEBERRIES – To promote more uniform budbreak, particularly in areas of marginal chilling, to reduce the period of fruit disease susceptibility and to promote more uniform harvest, use 1.5% (v/v) Duomax in 50 to 100 gallons of spray

per acre using a nonionic surfactant not to exceed 0.5% v/v with applications made 30 or more days prior to natural budbreak.

(In the State of Florida – use of Duomax in Alachua County, Florida is restricted from the area west of Route 441, except that north of the intersection of Route 441 and 175, use is also restricted west of 175 because of possible effects on the squirrel chimney cave shrimp *Palaemonetes cummingi*).

CHERRIES – For more uniform natural budbreak, or for earlier budbreak, leading to more uniform maturity or earlier maturity, apply after all pruning activities are complete, a 4% (v/v) spray in not more than 200 gallons of spray per acre using a nonionic surfactant not to exceed 0.5% v/v. If sufficient spray coverage cannot be achieved on very large trees with 200 gallons spray per acre, do not use Duomax. Applications should be made 30 or more days prior to normal budbreak. Spray applications should be made according to the anticipated budbreak timing required by the earliest variety within an interplanted orchard, unless each variety can be sprayed separately without significant drift or over-spray contacting previously sprayed varieties or non-target varieties. Maintain fungicide/bactericide spray activities, including dormant sprays, and protect bud growth as it occurs.

When budbreak begins to occur following application of Duomax, the bloom can be compressed to a few days, depending upon the weather. In order to accure proper pollination, a sufficient number of beehives of suitable strength to assure adequate polloination must be set in the orchard before first bloom activity is observed. Artificial pollination may be advised when bee activity is limited.

Duomax is a budbreak stimulant and will promote more uniform normal and/or earlier budbreak even when the maximum chill hour requirements are met. However, Duomax is not a substitute for shill hours. A 4% (v/v) spray will stimulate growth following a minimum amount of chilling (approximately 350-500 chill hours based on the threshold temperature of 43°F to 45°F).

GRAPES – WINE AND RAISIN – For promoting increased budbreak uniformity, and to promote more uniform harvest, apply a 4% spray in not more than 100 gallons per acre applied 30 or more days prior to normal natural budbreak. This use will help overcome blind bud disorder on such wine varieties as Cabernet Sauvignon. Low vigor vines may not be able to support the amount of bubreak and shoot growth that occurs as a result of Duomax use.

**DESERT GRAPES** – For use in desert grown grapes in California Counties of Imperial, Riverside and San Bernardino and in Arizona Counties of Maricopa, Pinal and Yuma.

To promote uniform budbreak apply Duomax as a 4% (v/v) solution is water using a nonionic surfactant not to exceed 0.5% v/v. prior to budbreak after all pruning activities are complete, including tieing of canes. Use a coarse droplet spray with nozzle pressure not to exceed 40 psi. use a minimum number of spray nozzles to achieve adequate wetting. Three to four nozzles are usually sufficient.

Do not exceed 100 gallons of spray per acre and do not use more than 4 gallons Duomax per acre. Make only one application per crop cycle. Do not tank mix with other materials except as listed above. If applied less than four weeks prior to natural budbreak, yield may be reduced.

For earlier than normal budbreak, make the application earlier than 4 weeks prior to normal budbreak but not later than January 31 and not before December 1.

Some yellowing on the first leaves may appear but the developing growth will be normal. In determining to apply Duomax to promote earlier than normal budbreak, the user should be aware that growing buds and shoots are susceptible to forst and may be killed or damaged by freezing temperatures.

To avoid possible exposure to the endangered Coachella Valley fringe-toed lizard in the vineyards located within boundaries of the Coachella Valley Preserve, applications may not be made within 50 feet of the boundary of the Coachella Valley Preserve.

NON-DESERT GRAPES - For use in California Counties of Kern, Tulare, Fresno, and Madera.

To promote uniform outbreak apply Duomax as a 4% (v/v) solution in water using a nonionic surfactant not to exceed 0.5% v/v, prior to budbreak after all pruning activities are completed, including tieing of canes. Use a coarse droplet spray with hozzle pressure not to exceed 40 psi, and a minimum number of spray nozzles to achieve adequate wetting.

Three to four nozzles are usually surficient. Do not exceed 100 gallons of total spray per acre and do not use more than 4 gallons Duomax per acre. Make only one application per crop cycle. Do not tank mix with other materials except as listed above. If applied less than four weeks prior to natural budbreak, yield may be reduced.

For earlier than normal budbreak, make the application earlier than 4 weeks prior to normal budbreak but not later than February 28 and not before January 1.

Some yellowing on the first leaves may appear but the developing growth will be normal. In determining to apply Duomax to promote earlier than normal budbreak, the user should be aware that growing buds and shoots are susceptible to frost and may be killed or damaged by freezing temperatures.

In areas where chill hour accumulation is marginal, Duomax should be applied as late as possible to permit maximum chill hour accumulation, but not later than 25 days before budbreak. Duomax will be most effective using the 4% (v/v) spray solution after the vines have accumulated a minimum of 50 hours of chilling.

Low vigor and low capacity vines should not have Duomax applied any earlier than 30 days prior to anticipated normal budbreak. Vines treated too soon risk reduced yield is conditions affecting growth following application are not favorable for a sustained period.

KIWI (California Only) – To promote more uniform natural budbreak or earlier budbreak, particularly in areas of marginal chilling, to reduce the period of fruit susceptibility to disease, and to promote more uniform harvest, apply a 4% spray, making only one application per crop cycle, in not to exceed 100 gallons per acre. This application will also reduce the canes' susceptibility to apical dominance, therefore increasing bud fruitfulness. Do not tank mix with other materials except up to 0.5% (v/v) of a non-ionic surfactant. If applied less than four weeks prior to natural budbreak, yield may be reduced.

For earlier than normal budbreak, make the application earlier than four wkks prior to normal budbreak.

To limit drift, use a coarse droplet nozzle, nozzle pressure must not exceed 40 psi, and spray to wet. Do not exceed 4 gallons per acre of Duomax per application.

Some yellowing on the first leaves may appear but the developing growth will be normal. In determining to apply Duomax to promote earlier than normal budbreak the user should be aware that growing buds and shoots are susceptible to forst and may be killed or damaged by freezing temperatures.

**PEACHES/NECTARINES** – (Not For Use in California) – For more uniform natural budbreak, or for earlier budbreak, leading to sharper bloom, more uniform maturity or earlier maturity, apply after all pruning activities are completed, use 1-1.5\$ (v/v) Duomax spray in not more than 200 gallons spray per acre using a nonionic surfactant not to exceed 0.5% v/v. Application should be made 30 ore more days prior to normal budbreak. Application less than 30 days prior to normal budbreak may resuld in reduced yield. In some areas, it may be possible to use lower rates if it is possible to monitor closely the accumulation of chill hours. If rates are too low and made too close to normal budbreak no results may occur.

Spray according to the anticipated budbreak timing of the earliest variety within an interplanted orchard, unless each variety can be sprayed separately without significant drift or overspray contacting previously sprayed varieties or nontarget varieties. If handgun spray applications are used, care must be taken not to over wet the lower portions of the tree because reduced fruitfulness will occur in the lower part of the tree as a result of phytotoxicity from increased spray dripping from the top of the tree. More uniform spray applications occur from speed sprayer treatment, resulting in more uniform distribution of material through the tree.

Duomax is a budbreak stimulant and will promote more uniform and/or earlier budbreak even when maximum chill hour requirements are met. However, Duomax is not a substitute for chill hours. A 1.5% (v/v) spray will stimulate growth following a minimum amount of chilling (approximately 300-500 chill hours based on a threshold temperatures of 43°F to 45°F).

Duomax use on any orchard historically damaged by frost, such as in Southeastern states must be done with the knowledge that Duomax treated trees are equally as frost sensitive as non-treated trees. If Duomax is used to start growth even a few days early, resulting flowers and/or fruit can be subject to frost damage.

Note to User: Application at rates in excess of those stated above may reduce emergence of primary beds, causing secondary bud growth which can reduce yield in the immediate crop cycle.

### STORAGE AND DISPOSAL

STORAGE: Keep under cool conditions, not to exceed 20°C (68°F). Do not store in direct sunlight.

PROHIBITIONS: Do not contaminate water, food, or feed by storage or disposal. Open dumping is prohibited.

Keep pesticide in original container

**PESTICIDE DISPOSAL:** Wastes resulting from the use of this product may be disposed of on site or an an approved waste disposal facility.

**CONTAINER DISPOSAL:** Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

### CONDITION OF SALE

- 1. Green Trees and Plants II LLC. warrants that this product consists of the ingredients specified and is reasonably fit for the purpose stated on this label when used in accordance with the directions under normal conditions of use. No one other than an officer of Green Plants and Trees II LLC. is authorized (and such authorization must be in writing) to make any other warranty, guarantee or direction concerning this product.
- 2. Because the time, place, rate of application, weather conditions and normal or abnormal conditions of use or storage are beyond Green Trees and Plant's control, Green Trees and Plant's liability is limited to replacement of product or refund of purchase price. In no even shall Green Trees and Plants be liable for indirect or consequential damages.

MANUFACTURED FOR Green Trees and Plants II LLC. 250 Lawrence St. Marietta GA 30060



# Matthew Brooks <mwbrooks01@yahoo.com> 03/27/2008 09:40 AM

To John Bazuin/DC/USEPA/US@EPA, Tony Kish/DC/USEPA/US@EPA

C¢

bcc

Subject Revised cert form

Hi John See attached. -Matt

Matthew Brooks, Ph.D. 703-266-0128 Phone 703-266-4377 Fax



mwbrooks01@yahoo.com Cert from for duomax.pdf



# United States Environmental Protection Agency 401 m Street, S.W. Washington, D.C. 20469

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Certification with Respec	t to Citation of	Data				
Applicant's/Registrant's Name, Address, and Yelephone Number Gmen Yrees and Plents II LLC		EPA Registration Number/File Symbol 84374-R				
Active (nonedlent/s) and/or representative test compound(s) Hydrogen Cyemenikic		Date 1/16/08				
General Use Pattern(s) (fist all those claimed for this product using 40 CFR Part 15 Temestrial Food	8)	Product Name Duomaix				
NOTE: If your product is a 100% repeckaging of another purchased EPA-register submit this form. You must submit the Formulator's Exemption Statement (EPA For	ed product labeled k m 8570-27).	or all the same uses on your label, you do not need to				
) am responding to a Data-Call-in Notice, and have included with this form a first of companies sent offers of compensation (the Data Metric form should be used for this purpose).						
SECTION I: METHOD OF DATA BUP	PORT (Check one m	othod only)				
I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).	i Y under the	g the selective method of support (or old-all option selective method), and have included with this form a glost of data requirements (the Data Matrix form must be				
SECTION II: GENERAL	OFFER TO PAY					
[Required if using the cite-all method or when using the cite-all option under the select hereby effer and agree to pay compensation, to other persons, with regard to		·				
SECTION III: CERT	THICATION					
l certify that this application for registration, this form for reregistration, or it application for registration, or the Cata-Call-in response. It indicated in Section I, this application is supported by all data in the Agency's files the substantially similar product, or one or more of the Ingredients in this product; and (2) requirements in effect on the date of approval of this application if the application soul uses.	a suddition, if the cities of (1) concern the pro is a type of deta that girt the initial registral	all Option or citie-all option under the solactive method is perties or effects of this product or an identical or would be required to be automitted under the date tion of a product of identical or similar composition and				
I certify that for each exclusive use atudy cited in support of this registration the written permission of the original data automitism to cite that atudy						
) certity that for each study cited in support of this registration or reregistration that is not an exclusive use study, either (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (c) I have notified in writing the company that submitted the study and have infered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the whoult and terms of compensation, if any, to be paid for the use of the study.						
I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in coordinate with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA am available and will be submitted to the Agency upon request. Should I fait to produce such vidence to the Agency upon request, I understand that the Agency may invites action to deny, cancel or suspend the registration of my product in conformity with IFRA.						
I certify that the statements I have made on this form and all attachm increingly false or misleading statement may be punishable by fine or imprison.	ients to it are true, i innent or both und	eccurate, and complete. 1 acknowledge that any or applicable law.				
Signature J. A. A.	Date 3/25/08	Typed or Printed Neme and Title Dennis Kristof, President				

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16



# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 481 M Street, S.W. WASHINGTON, D.C. 20460

	ng D.C. Zutey	
Paperwork Reduction Act Notice: The public reporting burden for this collection and 0.25 hours per response for reregistration and special review activities, includin comments regarding burden estimate or any other aspect of this collection of information Management Division (2137), U.S. Environmental Protection Agency, 4 Do not send the completed form to this address.	agica jackages end	send coords and completing the recessary forms. Send
Certification with Respe	at to Citation of	Data
Applicants/Registrant's Name, Address, and Telephone Number Green Trees and Plants II LLC		EPA Registration Number/File Symbol 84374-R
Active Ingredient(s) and/or representative test compound(s) Hydrogen Gyenemicke	Date 1/18/08	
General Use Pattern(s) (list all those citained for this product using 40 CFR Part 15 Temestrial Food		Product Name Duomex
NOTE: If your product is a 100% repairing of another purchased EPA-register submit this form. You must submit the Formalistor's Exemption Statement (EPA For	ed product labeled f m 8570-27).	or all the same uses on your label, you do not need to
I am responding to a Data-Call-in Notice, and have included with this form a be used for this purpose).	l list of companies a	ent offers of compensation (the Data Meets form should
SECTION I: METHOD OF DATA SUP	PORT (Chack one n	ethod only)
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SECTION 4: GENERAL	OFFER TO PAY	
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SECTION IN: CERT	PICATION	
I certify that this application for registration, this form for reregistration, or the speciation for registration, the form for reregistration, or the Cata-Call-in response. It indicated in Section I, this application is supported by all date in the Agency's files the substantially striker product, or one or more of the ingredients in this product; and (2) requirements in effect on the date of approval of this application if the application sour uses.  I certify that for each exclusive use study cited in support of this registration.	addition, if the cite- t (1) concern the pri is a type of data ther that the initial registra	all option or cite-all option under the selective method is porties or effects of this product or an identical or would be recycled to be submitted under the date tion of a product of identical or similar composition and
the written permission of the original data submitter to cite that study	•,	
I certify that for each study cited in support of this registration or reregistration submitter; (b) I have obtained the permission of the original data submitter to use the compensation have expired for the study; (d) the study is in the public literature; or (e) offered (f) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c) amount and terms of compensation, if any, to be taked for the use of the study.	study in support of the law in which the law in the law in which (2) (B) of FIFRA; and (	is application; (c) all periods of eligibility for ling the company that submitted the study and have id (ii) to commence negotiations to determine the
l certify that in all instances where an offer of compensation is required, cop accordance with sections 3(c)(1)(r) and/or 3(c)(2)(B) of FIFRA are available and with this indence to the Agency upon request, I understand that the Agency may initiate action FIFRA.	be submitted to the A to deny, cancel or t	igency upon request. Should I fail to produce auch suspend the registration of my product in conformity with
i certify that the statements I have made on this form and all attachm knowingly false or misleading statement may be punishable by fine or impriso	ents to it are true, nment or both und	accurets, and complete. I acknowledge that any er applicable law.
Signature JR (1) ALT)	Date 3/25/06	Typed or Printed Neme and Title Dennis Kristof, President

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# Matthew Brooks <mwbrooks01@yahoo.com> 03/27/2008 09:40 AM

To John Bazuin/DC/USEPA/US@EPA, Tony Kish/DC/USEPA/US@EPA

CC

bcc

Subject Revised cert form

Hi John See attached. -Matt

Matthew Brooks, Ph.D. 703-266-0128 Phone 703-266-4377 Fax



mwbrooks01@yahoo.com Cert from for duomax.pdf



# Matthew Brooks <mwbrooks01@yahoo.com> 03/26/2008 08:31 AM

To John Bazuin/DC/USEPA/US@EPA

cc Tony Kish/DC/USEPA/US@EPA

pcc

Subject Duomax revised matrix and cert form

Hi John

see attached- mailed cert letter to trostberg today. -Matt

Matthew Brooks, Ph.D. 703-266-0128 Phone 703-266-4377 Fax







mwbrooks01@yahoo.com citation certification.pdf DuoMax Oata Matrix.pdf DuoMax Public Data Matrix.pdf

Cell: 703-489-7729



# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 401 M Street, S.W. WASHINGTON, D.C. 20460

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Certification with Respec	t to Citation of	Data				
Applicants/Registers's Name, Address, and Telephone Number Green Trees and Plants II LLC		EPA Registration Number/File Symbol 84374-R				
Active ingradient(s) and/or representative test compound(s) Hydrogen Cyensmide		Date 1/18/08				
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158 Termetrial Food	)	Product Name Duomax				
NOTE: if your product is a 100% respectaging of another purchased EPA-registers submit this form. You must aubmit the Formulator's Exemption Statement (EPA Formulator) (E	ed product isheled to n 8570-27).	Fall the same uses on your label, you do not need to				
t am responding to a Data-Call-in Notice, and have included with this form a list of compenies sent offers of compensation (the Data Metrix form should be used for this purpose).						
SECTION I: METHOD OF DATA SUFF	ORT (Check one m	ethod only)				
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SECTION 4: GENERAL	OFFER TO PAY					
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SECTION HI: CERT	IFICATION					
I certify that this application for registration, this form for reregistration, or this Data-Call-in response is supported by all data submitted or clad in the application for registration, the form for reregistration, or the Data-Call-in response. In addition, if the citie-all option or class all option under the selective method is indicated in Section t, this application is supported by all date in the Agency's fless that (1) concern the properties or offices of this product or an identical or substantially similar product, or one or more of the ingredients in the product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application for application sought the initial registration of a product of identical or similar composition and uses.						
l certify that for each exclusive use eachy cloud in support of this registration the written permission of the original data supports to cite that abody	or neregistration, the	it I sen the original dups aubminier or that I have obtained i				
I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (f) to pay compensation to the extent required by sections 3(c)(f)(F) and/or 3(c)(2)(B) of FIFRA; and (f) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.						
I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.						
) certify that the statements I have made on this form and all attachm knowingly take or misleading statement may be purishable by fine or impriso	erite to 2 are true, nament or both und	accumité, and complete. I acknowledge that any ler applicable law.				
Signature JR 1 HALL	Date 3/25/08	Typed or Printed Name and Title Dennis Kristof, Prusident				

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		DATA MATRIX				
Date March 25,2008		EPA Reg No./File Symbol 84374-R		Page tot 16		
			Product DuoMax			
Ingredient Hydrogen Cyanamide						
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note	
8t-t	Acute Oral Tox-rat	00069487	SEE 54555	Old		
8 t-t	Acute Orat Tox-Rat	00 t t0395	BASF Corporation	Old		
8t-t	Acute Oral Tox-Rat	D0148021	Alzcham Trostberg GMBH	Old		
81-2	Acute Dermat Tox-rat	00043347	BASF Corporation	Old		
B t-2	Acute Dermal Tox-rat	00 t t0395	BASF Corporation	Old		
81-2	Acute Dermat Tox-rat	4128880 t	Alzchem Trostberg GMBH	Old		
8t-3	Acute Inhalation Tox-Rat	00069488	SEE 54555	Old		
81-3	Acute Inhalation Tox-Rat	00148023	Alzchem Trostberg GMBH	Old		
81-4	Primary Eye trritation	00043347	BASF Corporation	014	1	
8 t-4	Primary Eye Irritation	00 104220	BASF Corporation	ОМ		
8 t-4	Primary Eye irritation	00110395	BASF Corporation	Old		
8t-5	Primary Dermat Imitation	00104220	BASF Corporation	Otd		
8t-5	Primary Dermat trotation	00148025	Alzchem Trostberg GM8H	Old		
8 t-8	Dermat Sensitization	00148026	Alzchem Trostberg GMBH	Old		
8 t-6	Dermal Sensitization	41288807	Alzchem Trostberg GM8H	Old		
Signature	- 6		Name and Titte Dr. Matthew Brooks, Director		Oate 3/25/08	

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		DATA MATRIX			
Date March 25, 2008		EPA Reg No./File Symbol 84374-R		Page 2 of 16	
			Product Duo Max		
Ingredient Hydrogen Cyanamide					
Guideline Reference Number	Guldeline Study Name	MRID Number	Submitter	Status	Note
82-1	90 Day Feeding	00043347	BASF Corporation	Old	
82-1	28 Day Rangefinding- Oral Feeding	00069491	SEE 54555	Old	,
82-1	90 Day Feeding-Rat	00069492	SEE 54555	Old	
82-1	90 Day Feeding-Rat	00110395	BASF Corporation	Old	
82-1	28 Dey Hangelinding- Oral Feeding	00148027	Alzchem Trosiberg GMBH	Did	
82-1	90 Day Feeding-Hat	00148028	Aizchem Trostberg GMBH	Old	
82-1	90 Day Feeding-Dog	00148029	Alzchem Trostberg GMBH	Old	
82-1	90 Day Feeding-Dog	41390501	Alzchem Trostberg GMBH	Old	
82-1	28 Day Repeated Oral Dose	42202902	Alzchem Trostberg GMBH	Old	
83-1	Chronic Feeding Study - Dog	4 1288802	Alzchem Trostberg GMBH	Old	
83-t	Chronic Feeding Study - Mouse	4 1288803	Alzchem Trosiberg GMBH	Old	
83-1	Chronic Feeding Study - Rat	41288904	Alzchem Trostberg GMBH	OR	_
83-1	Chronic Feeding Study - Rat	41504003	Alzchem Trostberg GM8H	Old	
83-1	Chronic Feeding Study - Rat	42178404	Alzchem Trostberg GMBH	Old	
83-1	104 Week Carcinogenicity Study-Mouse	41566502	Alzchem Trostberg GMBH	Old	
Signature Just 1	h		Name and Title Dr. Matthew Brooks, Director		Date 3/25/08



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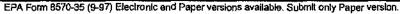
		TA MATRIX			<del></del>
Dale March 25, 2008	DA	IN HACINA	EPA Reg No/File Symbol 84374-R		Page 3 of 16
Applicant's/Registrant's Name & Address Green Trees and Plants II, LLC 12208 Quinque Lane, Clifton VA 20124			Product DuoMax		
Ingredient Hydrogen Cyanamide		······································		······································	
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
84-2	Mutagentcity	00148033	Alzchem Trostberg GMBH	Oid	
84-2	Chomosomat Aberration	00148034	Alzchem Trostberg GMBH	Old	
84-2	Chromosomal Aberration	00 t48035	Alzchem Trostberg GMBH	Old	
84-2	Mulagenicity	00 f48036	Alzchem Trostberg GMBH	Old	
84-2	Chomosomal Aberration	40389607	Alzchem Trostberg GMBH	Old	
84-2	Salmonella Mutation Assay	40389608	Alzchem Trostberg GMBH	Old	
84-2	Cytogenetic Assay	40389609	Alzchem Trostberg GMBH	Old	
84-2	Mouse Micronucteus Assay	40389610	Alzchem Troslberg GMBH	Old	a <sup>2</sup>
85-1	General Metabolism	00 t48037	Alzchem Trostberg GMBH	Old	
85-f	General Met of Hydrogen Cyanamide-Rat and Human	40748702	Alzchern Trostberg GMBH	Old	
85-f	General Melabotism	42178407	Alzchern Trostberg GMBH	Otd	
85-3	Dermal Absorption of f4C-Cyanamide in Rat	4 f 504004	Alzchem Trosiberg GMBH	Oid	
				_	
Signature	(		Name and Title		Date
Tot			Dr. Matthew Brooks, Director		3/25/08



### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 401 M Street, S.W. WASHINGTON, D.C. 20460

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		DATA MATRIX			
Date March 25,2008		EPA Reg No /File Symbol 84374-R		Page 4 of 16	
			Product DuoMax		
Ingredient Hydrogen Cyanamide					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Stafus	Note
83-2	Oncogenicity	00 t48030	Alzchem Trostberg GMBH	Old	
83-2	80 Week Carcinogenicity	41390502	Alzohem Tros/berg GMBH	Old	
83-2	f04 Week Oral Carcinogenicity Study	41566502	Alzchem Trosfberg GMBH	Old	
83-2	f 04 Week Orat Carcinogenicity Study	42178405	Alzchem Tros/berg GMBH	Old	
83-3	Embryotoxicity/Teratogenicity	00 (48031	Alzchem Trosfberg GMBH	Old	
83-3	Embryotoxicity/Teratogenicity	41288805	Alzchem Trostberg GMBH	Old	
83-3	Rat Terafology	41288806	Alzchem Trostbarg GMBH	Old	
83-4	Two Generation Reproduction-Rat	40389602	Alzchem Trostberg GMBH	Old	
83-4	Spontaneous Matformallons-Rat	40389603	Alzchem Trosfberg GMBH	Old	
83-4	Incidences of Tumors	40389604	Alzchem Trostberg GMBH	Old	
83-4	Background Pathology-3 month study-Rat	40389605	Alzchem Troslberg GMBH	Old	
83-4	Background Pathology-12 Month Study-Rat	40389606	Alzchem Trosiberg GMBH	Old	
83-4	Beckground Pathology-24 month study-Raf	40436 (01	Alzchem Trosiberg GMBH	Old	
83-4	Two Genaraflon Reproduction-Rat	41566504	Alzchem Trostberg GMBH	ОМ	
<u></u>					
Signature			Name and Tille	•	Date
Obst			Or. Matthew Brooks, Director		3/25/08





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		DATA MATRIX			
Date March 25, 2008		EPA Reg No./File Symbot 84374-R		Page 5 of 16	
Applicant's/Registrant's Name & Address Green Trees and Plants II, LLC, 12208 Quinque Lane, Clifton VA 20124			Product DuoMax		
Ingredient Hydrogen Cyanamide					
Guideline Reference Number	Guldeline Study Name	MRID Number	Submitter	Stalus	Note
71-t	Avian Acute Oral- Bobwhite Quail	00153783	Alzchem Trostberg GMBH	Old	
7 t- t	Avian Acute Oral- Mallard	00 t 53784	Alzchem Trostberg GMBH	Otd	
7 t-2	Avian Dietary LC50-Bobwhite Quail	00153785	Alzchem Trosiberg GMBH	Old	
71-2	Avian Dietary LC50-Mallard	42178 <b>4</b> 01	Alzchem Trostberg GMBH	Old	
71-2	Avian Dietary LC50-Bobwhite Quail	42178402	Alzchem Trostberg GMBH	Old	
72-1	Acute Toxicity- Rainbow Frout	00148043	Alzohem Trostberg GMBH	Old	
72-1	Acute Tox-Fish	00148044	Alzchem Trostberg GMBH	Old	
72-2	Acute Tox- Daphnia	00148046	Alzchem Trostberg GM8H	Old	
72-t	Acute Tox- Bluegill	00153786	Alzchem Trostberg GMBH	Okt	
72-4	Early Life Stage-Trout	44076701	Alzohem Trostberg GMBH	PAY	
72-4	Chronic Toxicity to Daphnia	44076702	Alzchem Troslberg GMBH	PAY	
72-3	96hr Flow-Through Sheepshead Minnow	44804702	Alzchem Trostberg GMBH	PAY	
72-3	96hr Shell Deposition	44804704	Alzchem Trostberg GM8H	PAY	
72-3	96 hr acute tox w/sallwater mysld	44804703	Alzchem Troslberg GMBH	PAY	
Signature	- 4		Name and Title Dr. Matthew Brooks, Director		Date 3/25/08





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		DATA MATRIX			
Date March 25, 2008		EPA Reg No./File Symbol B4374-R		Page 6 of 16	
			Product DuoMax		
Ingredient Hydrogen Cyanamide					
Guldeline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
t61-1	Hydrolysis	00148017	Alzchem Trostberg GMBH	Old	
161-2	Photodagradation in water	42178409	Aizchem Trostberg GMBH	Old	
162-1	Aerobic Soil Metabollsm	00148013	Alzchem Trostberg GMBH	Old	
162-1	Aerobic Soll Metabolism	00148014	Alzcham Trostberg GMBH	Old	
162-1	Aerobic Soil Metabolism	4 t566505	Alzchem Trostberg GMBH	Old	
162-1	Aerobic Soil Metabollsm	42t78410	Alzchem Trostberg GMBH	Old	-
162-1	Aerobic Soil Melabolism	4217B4t1	Alzchem Troslberg GMBH	OHG	
162-t	Aerobic Soll Metabolism	00148016	Alzchem Trostberg GMBH	OM	
162-1	Aerobic Soil Melabolism	422 t 1201	Alzchem Trostberg GMBH	OM	
162-1	Aerobic Solt Metabolism	4221 t202	Alzchem Trostberg GMBH	Old	
162-2	Anaerobic Soil Metabolism	41390503	Alzchem Trosiberg GMBH	Old	
162-2	Anaerobic Soli Metabolism	42178412	Alzchem Trostberg GMBH	Old	
162-2	Anaerobic Soil Metabolism	421784t3	Alzchem Trostberg GMBH	Old	
162-2	Anaerobic Soit Metabolism	42211203	Alzchem Trostberg GMBH	Old	
Signature			Name and Title		Date
That	5 4V		Dr. Matthew Brooks, Director		3/25/08



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		DATA MATRIX				
			EPA Reg No./File Symbol 84374-R		Page 7 of 16	
			Product DuoMax			
tngredient Hydrogen Cyanamide						
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note	
t63-1	Adsorption/Desorption In Soil	42178414	Alzchem Trostberg GMBH	Old		
163-1	Soil Column Leaching	42178415	Alzchem Trostberg GMBH	ОМ		
164-1	Soil Dissipation	00148015	Alzchem Trosiberg GMBH	Old		
164-1	Soll Dissipation	00148018	Alzchem Trostberg GMBH	Old		
164-1	Field Soil Dissipation of Dormex	42178416	Alzchem Troslberg GMBH	Old		
132-1	Dislod geable Fottar Residue	42178408	Alzchem Troslberg GMBH	Old		
202-1	Drift Concentration from Grapevine Applications	42178424	Alzchem Trostberg GMBH	Old		
71-4	Reproductive effects on bobwhile quail	45797201	Alzchem Troslberg GMBH	PAY		
122-1	Effects of Cyanamide on nontarget plants	4538070 t	Alzchem Trostberg GMBH	PAY		
t22-t	Seedling Emergence	45380702	Alzchem Trostberg GMBH	PAY		
122-2	Algal Growth Inhibition	45382201	Atzchem Trostberg GMBH	PAY		
122-2	96 hr Aigat Inhibition	45406601	Alzchem Trostberg GMBH	PAY		
122-2	96 hr algal inhibition	45406602	Alzchem Trostberg GMBH	PAY		
162-4	Aerobic Aquatic Degradation	45382202	Alzchem Trostberg GMBH	PAY		
Signature	= 4-		Name and Title		Date	
~ V100			Dr. Matthew Brooks, Director		3/25/08	



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	·	DATA MATRIX			
Date March 25, 2008			EPA Reg No./File Symbol 84374-R		Page 8 of 16
Applicant's/Registrant's Name & Address Green Trees and Plants II, LLC, 12208 Quinque Lane, Clilton VA 20124		Product DuoMax			
Ingredient Hydrogen Cyanamide					
Guldelina Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
122-2	Vegetative Vigor	4038010 t	Alzchem Trostberg GMBH	Old	
171-45	Analysis of Collonseed	00043361	BASF Corporation	Old	
17t-4c	Residues on Cotton Seed	00043362	BASF Corporation	Old	
171-4A2	Metabotism in Cotton Plants	00043363	BASF Corporation	Old	
171-5	Reduction of Residue-Cotton seed oil	00043364	BASF Corporation	Old	
17t-5	No Residue Petition	00043365	BASF Corporation	Olq	
171-4A2	Residue in Plants	00069483	SEE 54555	Old	
t71-4C	Residue Summary in Ginned Cotton seed	00110394	BASF Corporation	Old	
171-4C	Residue Study In Grapes	40329902	Alzchem Trostberg GMBH	Old	
171-4C	Storage Stability in grapes	40329903	Alzchem Trosiberg GM8H	Old	
17t-4C	Residue Study in Grapes	40380101	Alzchem Trostberg GM8H	Old	
171-4C	Residue Study in Grapes	4074870 f	Alzchem Trostberg GMBH	Old	
171-4A2	Grape Contirmatory Trial	41288808	Alzchem Trostberg GMBH	Old	
171-4A2	NOR-Grape	41288809	Alzchern Trostberg GMBH	Olf	
Signature 2	- 4	, , , , , , , , , , , , , , , , , , , ,	Name and Title Dr. Matthew Brooks, Director		Date 3/25/08

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EPA Reg No./File Symbol 84374-R  Product DuoMax  Submitter		Page 9 of 16
DuoMax		
Submitter		
Submitter		
	Status	Note
Alzchem Trostberg GMBH	ОМ	
Alzchem Trostberg GMBH	Old	
Alzchem Trostberg GM8H	Old	
Alzchem Trostberg GMBH	Old	
Atzchem Trostberg GM8H	Оы	
Alzcham Trostberg GMBH	Old	
Atzchem Trostberg GMBH	Old	
Alzchem Trostberg GM8H	Old	
Alzchem Trosiberg GMBH	Old	
Alzchem Trostberg GM8H	ОИ	
Alzchem Trostberg GMBH	Old	
Atzchem Trostberg GMBH	Old	
Alzchem Trostberg GMBH	Old	
Alzchem Trostberg GMBH	Old	
Name and Title	<u>_</u>	Date 3/25/08
	Alzchem Trostberg GMBH	Alzchem Trostberg GMBH Old  Name and Title



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		DATA MATRIX				
Date March 25, 2008			EPA Reg No./File Symbol 84374-R		Page 10 of 16	
Applicant's/Registrant's Name & Address Green Trees and Plants II, LLC, 12208 Ouinque Lane, Clifton VA 20124		Product DuoMax				
Ingredienl Hydrogen Cyenamide						
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note	
63-t0	Oisassociation Constant		Green Trees and Plants II LLC	Submitted		
63-9	Vapor Pressure		Green Trees and Plants II LLC	Submitted		
62-3[830.1670]	Color		Green Trees and Plants II LLC	Submitted		
63-3 [830.6303]	Physical State		Green Trees and Plants II LLC	Submitted		
63-4[830.6304]	Odor		Green Trees and Plants II LLC	Submitted		
63-6[830.7220]	Boiling Point		Green Trees and Plants II LLC	Submitted		
63-7[830.7300]	Density		Green Trees and Plants II LLC	Submitted		
63-8[830.7840]	Solubility		Green Trees and Plants II LLC	Submitted		
63-5	Melting Point		Green Trees and Plants II LLC	Submitted		
63-12[830.7000]	рH		Green Trees and Plants II LLC	Submitted		
63-21	Dielectric Breakdown Voltage		Green Trees and Plants II LLC	Submitted		
				<u> </u>		
Signature	. , /		Name and Title		Date	
00	ato W		Dr. Matthew Brooks, Director		3/25/08	



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		DATA MATRIX				
Date March 25, 2008			EPA Reg No./File Symbot 84374-R		Page 11 of 16	
Applicant's/Registrant's Name & Address Green Trees and Plants II, LLC 12208 Quinque Lane, Clifton VA 20124			Product DuoMax			
Ingredient Hydrogen Cyanamide					·	
Guideline Reference Number	Guideline Study Name	MRtD Number	Submitter	Status	Note	
63-11	Octanol/Water Partition	00069482	SEE 54555	Olld		
63-11	Octonal/Water Partition	41504001	Atzchem Trostberg GMBH	Old		
63-11	Octanot/ Water Partition	42202901	Alzohem Trostberg GMBH	Old		
63-13	Stability	00069482	SEE 54555	Old		
63-13	Stability	41504001	Alzchem Trostberg GMBH	Old		
63-13	Stability	4220290 t	Alzchem Trostberg GMBH	Old		
63-15	Redox Potential	00069482	SEE 54555	Ota		
63-15	Redox Potential	41504001	Alzchem Trostberg GMBH	Old		
63-15	Redox Potential	42202901	Alzchem Trostberg GMBH	Otd		
<del></del>						
<u>,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,</u>						
Signature		<u></u>	Name and Title		Date	
low	4		Dr. Matthew Brooks, Director		3/25/08	

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MRID Number	Product DuoMax  Submitter Green Trees and Plants ti LLC Green Trees and Plants ti LLC	Status Submit Submit	Page 12of 16  Note
ARID Number	Submitter Green Trees and Plants (I LLC Green Trees and Plants II LLC Green Trees and Plants II LLC	Submit Submit	Note
/RID Number	Green Trees and Plants II LLC Green Trees and Plants II LLC Green Trees and Ptants II LLC	Submit Submit	Note
MRID Number	Green Trees and Plants II LLC Green Trees and Plants II LLC Green Trees and Ptants II LLC	Submit Submit	Note
	Green Trees and Plants II LLC Green Trees and Plants It LLC	Submit	
	Green Trees and Ptants tt LLC		
		Submit	
***************************************	O Trees and Blance #1110	3000111	
	Green Trees and Plants II LLC	Submit	
	Green Trees and Plants II LLC	Submit	
	Grean Trees and Plants II LLC	Submit	
	Green Trees and Plants II LLC	Submit	
	Green Trees and Plants It LLC	Submit	
			<u> </u>
<del></del>	<u></u>		
<del></del>			
	Name and Title		Date 3/25/08
		Green Trees and Plants II LLC Green Trees and Plants II LLC	Green Trees and Plants II LLC Submit  Green Trees and Plants It LLC Submit  Name and Title

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ž	DATA	A MATRIX				
Date March 25, 2008		EPA Reg No./File Symbol 84374-R		Page 13ot 16		
			Product OuoMax [End-Use Product]			
Ingredient Hydrogen Cyanamide						
Guideline Reference Number	Guideline Study Name	MR(D Number	Submitter	Status	Note	
63-15	Flammability		Green Trees and Ptants It LLC	Submitted		
63-16	Explodability		Green Trees and Plants II LLC	S∪bmitted		
62-3[830.1670]	Color		Green Trees and Plants It LLC	Submitted		
63-3 [830.6303 <b>]</b>	Physical State		Green Trees and Plants II LLC	Submitted		
63-4[830.6304]	Odor		Green Trees and Plants It LLC	Submitted		
63-18	Viscosity		Green Trees and Plants II LLC	Submitted		
63-7(830.7300)	Density		Green Trees and Plants !! LLC	Submitted		
63- <b>8 8</b> 30.7840]	Solubility		Green Trees and Plants II LLC	Submitted		
63-19	Misciblity		Green Trees and Plants II LLC	Submitted		
63-12[830.7000]	рН		Green Trees and Plants It LLC	Submitted		
63-21	Dielectric Breakdown Voltage		Green Trees and Plants II LLC	Submitted		
63-17	Storage Stability	00 (480 f t	Alzchem Trostberg GM8H	Old		
63-17	Storage Stability	42178408	Atzchem Trostberg GM8H	Old		
63-20	Corrosion Characteristics	0014801 t	Alzchem Trostberg GMBH	Oid		
63-20	Corrosion Characteristics	42178406	Alzchem Trostberg GMBH	Old		
Stgnature Late	4		Name and Title  Dr. Matthew Brooks, Director		Date 3/25/08	

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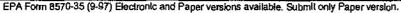
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	DA	TA MATRIX				
Date March 25, 2008			EPA Reg No./File Symbol 84374-R		Page 14 of 16	
Applicant's/Registrant's Name & Address Green Trees and Plants II, LLC, 12208 Quinque Lane, Clifton VA 20124			Product DuoMax [End Use Product]			
Ingredient Hydrogen Cyanamide						
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note	
158,165	Description of formulation process		Green Trees and Plants II LLC	Submit		
158.167	Discussion of impurities		Green Trees and Plants II LLC	Submit		
t58.170	Prellminary Analysis		Green Trees and Plants II LLC	Submit		
t57.1 <b>75</b>	Certifled Limits		Green Trees and Plants II LLC	Submit		
158.180	Entorcement Analytical Method		Green Trees and Plants II LLC	Submit		
158, t55	Product Identity and Composition		Green Trees and Plants II LLC	Submit		
158.160	Descrition of Materials used to produce the product		Green Trees and Plants It LLC	Submit		
158.162	Description of Production Process		Green Trees and Plants II LLC	Submit		
Signature			Name and Tille		Dale	
Total	= a		Dr. Matthew Brooks, Director		3/25/08	





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		DATA MATRIX			
Date March 25, 2008			EPA Reg No /File Symbol 84374-R		Page 15of 16
Applicant's/Registrant's Name & Address Green Trees and Plants II, LLC, 12208 Quinque Lane Clitton VA 20124			Product DuoMax [End-Use Product]		
Ingredient Hydrogen Cyanamid	e				
Guideline Reference Number	Guldetine Study Name	MRID Number	Submitter	Status	Note
81-1	Acute Oral Tox-rat	00104220	BASF Corporation	Old	
81-2	Acute Dermal Tox-rat	00069490	SEE 54655	Old	
81-2	Acute Dermat Tox-rat	00 t04220	BASF Corporation	Oid	
81-2	Acute Dermal Tox-rat	00148022	Atzchem Trosiberg GMBH	Old	
81-2	Acuje Dermal Tox-rat	41566501	Alzchem Trostberg GMBH	Oki	
8t-3 .	Acute Inhalation Tox-Rat	00069488	SEE 54555	Old	
81-3	Acute Inhalation Tox-Rat	00148023	Alzchem Trostberg GMBH	Old	
81-4	Primary Eye Irritation	`00069489	SEE 54555	Old	
81-4	Primary Eye Initation	00148024	Alzchem Trostberg GM8H	Old	
81-4	Primary Eye Irritation	00 t53782	Alzchem Trostberg GMBH	Ofq	
81-5	Primary Dermal Imitation	00153781	Alzchem Trosiberg GMBH	Ota	
81-6	Dermat Sensitization	00148026	Alzchem Trostberg GMBH	Old	
81-6	Dermal Sensitization	41288807	Alzchem Trostberg GMBH	Old	
Signature	40 h		Name and Title Dr. Matthew Brooks, Director		Date 3/25/08

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	DATA	MATRIX	······································	-	······································
Date March 25, 2008	Date March 25, 2008		EPA Reg No./File Symbol 84374-R		Page 16of 16
Applicant's/Registrant's Name & Addres Green Trees and Plants II, LLC, 12208			Product DuoMax [End-Use Product]		
Ingredient Hydrogen Cyanamide					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
	Biologic, Inc.				
	Agent for Alzchem Trostberg GMBH				
	115 Obluse Hill Road				
	Brooklield CT 20006				
	Wiley Rein LLP				
	Counsel for Alzchem Trostberg GMBH				
	1776 K Street NW				
	Washington DC 20006				
Signature Awa	- h		Name and Title  Dr. Matthew Brooks, Director		Date 3/25/08

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		DATA MATRIX			
Date March 25,2008			EPA Reg No./File Symbol 84374-R		Page 1 of 16
Applicant's/Registrant's Name & Ac	idress		Product		
Green Trees and Plants II, LLC 12	208 Quinque Lane Clifton VA 20124		DuoMax		
ngredient Hydrogen Cyanamide					
Guideline Reference Number Guideline Study Name	MRID Number	Submitter	Status	Note	
			SEE 54555	Old	
			BASF Corporation	Old	
			Alzchem Trostberg GMBH	Old	
			BASF Corporation	Old	
			BASF Corporation	Old	
			Alzchem Trosiberg GMBH	Old	
			SEE 54555	CHI	
			Alzchem Trostberg GMBH	Old	
			BASF Corporation	Old	
			BASF Corporation	Old	
			BASF Corporation	Old	
			BASF Corporation	Old	
			Alzchem Trostberg GMBH	Old	<u> </u>
			Alzchem Trostberg GMBH	Old	
			Atzchem Trostberg GMBH	Old	
Ignature /			Name and Title		Date
/_/	/2		Dr. Matthew Brooks, Director		3/25/08

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		DATA MATRIX			
Date March 25, 2008			EPA Reg No./File Symbol 84374-R	<u> </u>	Page 2 of 16
Applicant's/Registrant's Name & Ac	ldress		Product	<u></u>	
Green Trees and Pla⊓ls II, LLC 12	208 Quìnque Lane, Clifton VA 20124		Duo Max		
ngredient Hydrogen Cyanamide					
Suideline Reference Number	Guideilne Study Name	MRID Number	Submitter	Status	Note
***			BASF Corporation	Old	
			SEE 54555	Old	
			SEE 54555	ОМ	
			BASF Corporation	Old	
			Alzchem Trostberg GMBH	Old	
			Alzchem Trostberg GMBH	Old	<u> </u>
			Alzchem Trostberg GMBH	Old	
			Alzchem Trosiberg GMBH	Old	
			Alzchem Trostberg GMBH	Old	
			Alzchem Trostberg GMBH	Old	
			Alzchem Trostberg GMBH	Old	
			Alzchem Trostberg GMBH	Old	
			Alzchem Trostberg GMBH	Old	
			Alzchem Trostberg GMBH	Old	
			Alzchem Trostberg GMBH	Old	
ignature			Name and Title	<u>.</u>	Date
Mary	$= \mu$		Dr. Matthew Brooks, Director		3/25/08

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Date March 25, 2008			EPA Reg No./File Symbol 84374-R		Page 3 of 16
Applicant's/Registrant's Name & Ad	dress		Product		
Breen Trees and Plants II, LLC f2	208 Quinque Lane, Clifton VA 20124		DuoMax		
ngredient Hydrogen Cyanamide					
Suideline Reference Number	Guldeline Study Name	MRtD Number	Submitter	Status	Note
			Alzchem Trostberg GMBH	Old	
			Alzchern Trostberg GMBH	Old	
			Alzchern Trostberg GMBH	Old	
			Atzchem Trostberg GMBH	Old	
			Alzchem Trostberg GMBH	Otd	
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			Alzchem Trostberg GMBH	Old	
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			Alzchem Trostberg GMBH	Old	
			Alzchem Trostberg GMBH	Old	<u> </u>
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itgnature Last	6-	•	Name and Title  Dr. Matthew Brooks, Director		Date 3/25/08

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		DATA MATRIX			
Date March 25,2008	Date March 25,2008		EPA Reg No./File Symbol 84374-R	EPA Reg No./File Symbol 84374-R	
Applicant's/Registrant's Name & Ad	dress		Product		
Green Trees and Plants II, LLC, 12	208 Quinque Lane, Cillion VA 20124		DuoMax		
Ingredient Hydrogen Cyanamide					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Alzchem Trostberg GMBH	Old	
			Alzchem Trostberg GMBH	ОИ	
			Alzchem Trostberg GMBH	Old	
			Alzchem Trostberg GMBH	Old	
			Alzchem Trostberg GMBH	Old	
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			Alzchem Trostberg GMBH	Old	
			Alzchem Trostberg GMBH	Otd	
			Alzchem Trosiberg GMBH	Old	
			Alzchem Trostberg GMBH	Old	
			Aizchem Trostberg GMBH	Old	
Signature	/	, , , , , , , , , , , , , , , , , , , ,	Name and Title	······································	Date
Signature Azu	4		Dr. Matthew Brooks, Director		3/25/08

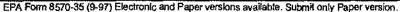
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		DATA MATRIX	<u> </u>		
Date March 25, 2008		EPA Reg No./File Symbol 84374-R	·	Page 5 of 16	
Applicant's/Registrant's Name & Ac	dress		Product		
ereen Trees and Plants II, LLC, 12	2208 Quinque Lane, Clifton VA 20124		DuoMax		
ngredient Hydrogen Cyanamide					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Alzchem Trostberg GMBH	Old	
			Alzchem Trostberg GMBH	Otd	
			Aizchern Trostberg GMBH	Old	
			Alzchem Trostberg GMBH	Old	
			Alzchem Trosiberg GMBH	Old	
			Alzchem Trostberg GM8H	Old	
			Alzchem Trostberg GMBH	Old	
			Alzchem Trosiberg GMBH	Old	
			Aizchem Trostberg GMBH	Old	
			Alzchem Trosiberg GMBH	PAY	
			Aizchern Trostberg GM8H	PAY	
			Aizchem Trostberg GMBH	PAY	· · · · · · · · · · · · · · · · · · ·
			Alzchem Trostberg GMBH	PAY	
			Aizchem Trostberg GMBH	PAY	
ignature			Name and Title	L,	Date
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		DATA MATRIX			
Date March 25, 2008		EPA Reg No./File Symbol 84374-R		Page 6 of 16	
Applicant's/Registrant's Name & Ad	dress		Product		
Green Trees and Plants II, LLC, 12	208 Quinque Lane, Clifton VA 20124		DuoMax		
Ingredient Hydrogen Cyanamide					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Alzchem Trostberg GMBH	Old	
			Alzchem Trostberg GMBH	Old	
			Alzchem Trostberg GMBH	Old	
			Alzchem Trostberg GMBH	Old	
			Alzchem Trostberg GMBH	Old	
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			Alzchem Trostberg GMBH	Old	
			Alzchem Trostberg GMBH	Old	
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Signature Ast	4		Name and Title Dr. Matthew Brooks, Director		Date 3/25/08





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		DATA MATRIX			
Date March 25, 2008			EPA Reg No./File Symbol 84374-R		Page 7 of 16
Applicant's/Registrant's Name & Ad	dress		Product	-	
Green Trees and Plants tl, LLC, 12	208 Oulnque Lane, Clifton VA 20124		DuoMax		
Ingredient Hydrogen Cyanamide					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Alzchem Trostberg GMBH	Old	
			Alzchem Trostberg GMBH	Old	
			Alzchem Trostberg GMBH	Olđ	
			Alzchem Trostberg GMBH	Old	
			Alzchem Trosiberg GMBH	Olđ	
			Alzchem Trostberg GMBH	Old	
			Alzchem Trostberg GMBH	Old	
			Alzchem Trostberg GMBH	PAY	
			Atzchem Trostberg GMBH	PAY	
			Alzchem Trostberg GMBH	PAY	
			Alzchem Trostberg GMBH	PAY	
			Alzchem Troslberg GMBH	PAY	
			Alzchem Trostberg GMBH	PAY	
			Alzchem Trostberg GM8H	PAY	
Signature			Name and Title		Date
Clase	4		Dr. Matthew Brooks, Director		3/25/08

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Date March 25, 2008		EPA Reg No./File Symbol 84374-R		Page 8 of 16	
Applicant's/Registrant's Name & Ad	dress		Product	····	•
Green Trees and Plants II, LLC, 12	208 Quinque Lane, Clifton VA 20124		DuoMax		
ngredient Hydrogen Cyanamide			<u> </u>		
Guldeline Reference Number	Guideline Study Name	MRIO Number	Submitter	Status	Note
			Alzchem Trostberg GMBH	Old	
			BASF Corporation	Old	
			BASF Corporation	Old	
			BASF Corporation	Old	
			BASF Corporation	Old	
			BASF Corporation	Old	
			SEE 54555	Old	
			BASF Corporation	Old	
			Alzchem Trostberg GMBH	Old	
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			Alzcham Trostberg GMBH	Old	
			Alzchem Trostberg GMBH	Old	
Signature			Name and Title		Date
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		DATA MATRIX			
oate March 25,2008			EPA Reg No/File Symbol 84374-R		Page 9 of 16
pplicant's/Registrant's Name & Ac	ddress		Product		
reen Trees and Plants II, LLC, fa	2208 Quinqua Lane, Clifton VA 20124		DuoMax		
gredient Hydrogen Cyanamide					
uideline Reference Number	Guideline Study Name	MRID Number	Submilter	Status	Note
			Alzchem Trostberg GMBH	Old	
			Alzchem Trostberg GMBH	Old	
			Alzchem Trostberg GMBH	Old	
			Alzchem Trostberg GMBH	Old	
			Alzchem Trostberg GMBH	Olq	
			Alzchem Trosiberg GMBH	ОМ	
			Alzchem Trostberg GMBH	OH	
			Aizchem Trostberg GMBH	Old	
			Alzchem Trostberg GMBH	Old	
			Alzchem Trostberg GMBH	Orq	
			Alzchem Trosiberg GMBH	Old	
			Alzchem Trosiberg GMBH	Old	
			Alzchem Trostberg GMBH	Old	
			Alzchem Trosiberg GMBH	Old	
gnature			Name and Title	······································	Date
4 1-	- V		Dr. Matthew Brooks, Director		3/25/08

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		DATA MATRIX			
Date March 25, 2008			EPA Reg No./File Symbol 84374-R		Page 10 of 16
Applicant's/Registrent's Name & A	ddress		Product		
Green Trees and Plants II, LLC, 12	2208 Quinque Lane, Clifton VA 20124		DuoMax		
ingredient Hydrogen Cyanamide					
Guideline Reference Number	Guideline Sludy Name	MRID Number	Submitter	Status	Note
			Green Trees and Plants II LLC	Submitted	
			Green Trees and Plants II LLC	Submitted	
			Green Trees and Plants II LLC	Submitted	
			Green Trees and Plants II LLC	Submitted	
			Green Trees and Plants II LLC	Submitted	
			Green Trees and Plants II LLC	Submitted	
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Signalure	, , , , , , , , , , , , , , , , , , , ,		Name and Title		Date
Pat,			Dr. Matthew Brooks, Director		3/25/08

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pplicant's/Registrant's Name & Ad	ddress		Product		
reen Trees and Plants II, LLC 12	208 Quinque Lane, Clifton VA 20124		DuoMax		
ngredient Hydrogen Cyanamide					
uideline Raference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			SEE 54555	Oltd	
			Alzchem Trostberg GMBH	Old	
			Atzchem Trostberg GMBH	Old	
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			Alzchem Trostberg GMBH	Old	
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gnature			Name and Title		Date
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		DATA MATRIX			
Date March 25, 2008			EPA Reg No./Fite Symbol 84374-R		Page 12of 16
Applicant's/Registrant's Name & Ad	dress		Product		
Green Trees and Plants II, LLC, 12	208 Gulnque Lane, Clifton VA 20124		DuoMax		
ngredient Hydrogen Cyanamide					
Guideline Reference Number	Guideline Study Name	MRtD Number	Submitter	Status	Note
			Green Traes and Plants II LLC	Submit	
			Green Trees and Plants It LLC	Submit	
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			Green Trees and Plants II LLC	Submit	
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		DATA MATRIX			
Date Merch 25, 2008			EPA Reg No./File Symbol 64374-R		Page t3 of 16
Applicant's/Registrant's Name & Addre	ess		Product		
Green Trees and Plants II, LLC. 12208	8 Quinque Lane, Clitton VA 20124		DuoMax [End-Use Product]		
Ingredient Hydrogen Cyanamide					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Green Trees and Plants II LLC	Submitted	
			Green Trees and Plants # LLC	Submitted	
			Green Trees and Plants II LLC	Submitted	
			Green Trees and Plants II LLC	Submitted	
			Green Trees and Plants II LLC	Submitted	
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			Green Trees and Plants II LLC	Submitted	
			Green Trees and Plants If LLC	Submitted	
			Green Trees and Plants II LLC	Submitted	
			Green Trees and Plants It LLC	Submitted	
			Alzchem Trostberg GMBH	Old	
			Alzchern Trostberg GMBH	Old	
			Alzchem Trostberg GMBH	Old	
			Alzchem Trostberg GMBH	Dld	
Signature	h		Name and Title  Dr. Matthew Brooks, Director		Date 3/25/06

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		DATA MATRIX			
Pate March 25, 2008			EPA Reg No./File Symbol 84374-R		Page 14of 16
Applicant's/Registrant's Name & Address		Product			
reen Trees and Plants II, LLC, 12	208 Quinque Lane, Clifton VA 20124		DuoMax [End Use Product]		
ngredlent Hydrogen Cyanamide					
iuldeline Reference Number	Guideline Study Name	MRID Number	Submilter	Status	Note
			Green Trees and Plants II LLC	Submit	
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Oate March 25, 2008		EPA Reg No.fFile Syrnbol 84374-FI		Page 15of 16	
Applicant's/Registrant's Name & Ad	dress		Product		
Green Trees and Plents II, LLC, 12	208 Quinque Lane Clifton VA 20124		OuoMax [End-Use Product]		
ngredient Hydrogen Cyanamide					
Guideline Reference Number	Guideline Study Name	MRIO Number	Submitter	Status	Note
			BASF Corporation	Old	
			SEE 54555	ОЮ	
			BASF Corporation	Old	
			Alzchem Trostberg GMBH	Old	
			Alzchem Trosiberg GMBH	Old	
			SEE 54555	Old	
			Alzchem Trostberg GMBH	Old	
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Signature	0 ;		Name and Title		Date
Signature  Name and Title  Dr. Matthew Brooks, Oirector			3/25/08		

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		DATA MATRIX			
Date March 25, 2008  Applicant's/Registrant's Name & Address  Green Trees and Plants II, LLC, 12208 Quinque Lane Clitton VA 20124		EPA Reg No./File Symbol 84374-R		Page t6of t6	
		Product DuoMax [End-Use Product]			
Ingredient Hydrogen Cyanamide					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
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ignature	Tate Brown		Name and Title Dr. Matthew Brooks, Director	<b>E</b>	Date 3/25/08

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#### RESTRICTED USE PESTICIDE

Due to corrosive effects to eyes and skin.

For Retail sale to and use only by Certified Applicators or persons under their direct supervision and only for those uses covered by the Certified Applicator's Certification.

A growth regulator for stimulating uniform budbreak:

#### DUOMAX-changed From "Dormex"

ACTIVE INGREDIENT	BY WEIGHT
Hydrogen Cynamide	50.00%
OTHER INGREDIENTS	50.00%
TOTAL	100.00%

#### 4.3 LBS. ACTIVE INGREDIENT PER GALLON

"U.S. PATENT 4,487,625" deleted

### KEEP OUT OF REACH OF CHILDREN DANGER – PELIGRO

Si usted no entiende la etiquette, busque a alguien para que se la explique a usted en detailée (If you do not understand this label, find someone to explain it to you in détail.)

رائد ج	range	(If you do not understand this label, find someone to explain it to you in detail.)	rest_
_	uch	FIRST AID	(( e E
ر ا	If on skin or clothing	<ul> <li>Take off contaminated clothing</li> <li>Rinse skin immediately with plenty of water for 15-20 minutes.</li> <li>Call poison control center or doctor for treatment advice.</li> </ul>	) 1 5 5
cha	If inhaled	<ul> <li>Move person to fresh air.</li> <li>If person is not breathing, call 911 or ambulance, then give artificial respiration, prefera mouth-to-mouth, if possible</li> <li>Call a poison control center or doctor for further treatment advice.</li> </ul>	bly
Vu	If in eyes	<ul> <li>Help eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>Remove contract lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>Call a poison control center or doctor for treatment advice.</li> </ul>	
	If swallowed	<ul> <li>Call poison control center or doctor immediately for treatment advice.</li> <li>Have person sip a glass of water if able to swallow.</li> <li>Do not induce vomiting unless told to do so by a poison control center or doctor.</li> <li>Do not give anything by mouth to an unconscious person.</li> </ul>	
	MOTES.		

#### NOTES

• Have the product container or label with you when calling a poison control center or doctor or going for treatment.

In the event of a medical emergency, you may also contact the National pesticide Information Center at 1-800-858-7378.

#### NOTE TO PHYSICIAN

- Immediate lavage of stomach.
- Hydrogen cyanamide is not hydrogen cyanide and does not degrade to hydrogen cyanide. Do not induce vomiting or give anything by mouth to an unconscious person.

CEPS REG No. 84374-R "BATCH NO." Jeleted EPA EST. No \$54555-W6-001 or NET CONTENTS XX GALS. "LITERS" deleted "LITERS" deleted

Compared to the 7/19/04 "ACCEPTED" label for 54555-2.

#### PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS DANGER

changed from

Corrosive, causes eye and skin damage. May be fatal if swallowed or absorbed through skin. Do not get in eyes, on skin or on clothing. Do not breathe spray mist. If a skin rash develops as a result of exposure to DUOMAX, avoid exposure to the material or its spray drift, some people may develop a sensitivity to DUOMAX. Avoid contamination of food and feed.

delete Fadded I PERSONAL, PROTECTIVE EQUIPMENT

Some materials that are chemical-resistant to this product are listed below. If you want more options, follow the instructions for category C on the EPA chemical resistance category selection chart.

changed From "a"

### GOT Neoprene Rubber & 14 mile deleted

Chemidal-resistant protective suit

- Chemical-resistant gloves such as Barrier Laminate, or Butyl rubber ≥14 mils, or Nitrile Rubber ≥14 mils, or Polyvinyl Chloride (PVC) ≥14 mils, or Vitron ≥14 mils.
- Chemical-resistant footwear plus socks
- Protective eyewear persons who mix, load or transfer must wear goggles. A full-faced respirator may be substituted for goggles.
- Chemical-resistant headgear for overhear exposure
- Chemical-resistant apron when cleaning equipment, mixing, or loading
- A respirator with either an organic-vapor-removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C), or a canister approved for pesticides (MSHA NIOSH approval number prefix TC-14G)
  changed from "/" \_ hange back

#### USER SAFETY REQUIREMENTS:

- No Alcoholic beverages. Do not consume alcoholic beverages prior to, during, and following (24 hours) handling this product.
- Dispose of Contaminated Clothing. Discard clothing and other absorbent materials that have been drenched or heavily contaminated with liquid from this product. Do not reuse them.
- Clean and maintain PPE: Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry. Wash PPE after each day's use.

ENGINEERING CONTROLS STATEMENTS: changed from "or Closed Systems: This product must be mixed, loaded, and transferred only in a closed system.

Closed Systems and Enclosed Cab Requirements (if applicable): This product must be applied only with the applicator in an enclosed cab. The closed system and enclosed eab must be used in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides {40 CFR 120.240(d)(4-

6)}. The handler PPE requirements may be reduced for modified as specified in the WPS. changed From The operating pressure of the spray rig shall be no more than 40 psi with the use of low pressure nozzles on

dilute boom sprays and no more than 100 psi on airfan sprayers. Airfan sprayers should have the fan adjusted so that the spray mist does not greatly exceed the top of the vines being sprayed.

USER SAFETY RECOMMENDATIONS

[added]

#### Users should:

- Wash hands before eating drinking, chewing gum, using tobacco, or using the toilet.
- Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing:
- Avoid contact with spray contaminated surfaces.

·- [added] -delete

#### ENVIRONMENTAL HAZARDS:

Do not apply this product to any area in which an endangered species has been identified or in such a manner that drift from applications of this product could result in destroying an endangered species. This limitation applies only to areas that have been identified by and are protected by State and Federal agencies. Do not apply closer than 300 yards to the mean high water mark for intertidal areas or closer than 300 yards to surface water. Do not apply to crops growing closer than 300 yards to rivers, streams, or their flowing tributaries. Do not contaminate water by the cleaning of equipment or disposal of equipment washwater or rinsate. Do not apply when weather conditions favor drift from treated areas or where runoff is likely to occur. Do not spray when bees are active in the field.

This chemical can contaminate surface water through ground spray applications. Under some conditions it may also have a high potential for runoff into surface water after applications. These include poorly draining or wet soils with readily visible slopes toward adjacent surface waters, frequently flooded areas, areas overlaying extremely shallow ground water, areas with in-field canals or ditches that drain to surface water, areas not separated from adjacent surface waters by vegetated filter strips, and areas overlaying tile drainage systems that drain to surface water. This pesticide is highly toxic to freshwater invertebrates and moderately toxic to birds and mammals. Drift and runoff may be hazardous to aquatic organisms in neighboring areas.

#### AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE), notification to workers, and restricted-entry intervals. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted entry interval (REI) of 72 hours.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil or water, is:

- Chemical-resistant protective suit
- Chemical-resistant gloves, such as Barrier Laminate, or Butyl Rubber ≥14 mils, or Nitriel Rubber ≥14 mils, or Neoprene Rubber ≥14 mils, or Polyvinyl Chloride (PVC) ≥14 mils, or Viton ≥14 mils.
- Chemical-resistant footwear plus socks
- Protective eyewear persons who mix, load or transfer must wear goggles. A full-faced respirator may
  be substituted for goggles.

Chemical-resistant headgear for overhead exposure.

Notify workers of the application by warning them orally and by posting warning signs at entrances to treated areas.

Add a bullet and continue the tornat of the bulleted items list.

Emoved to below the "AGRICULTURAL JUSE REQUIREMEN" S" box] Move back up

[added]

#### DIRECTIONS FOR USE

It is a violation of federal law to use this product in a manner inconsistent with its labeling.

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers or protected supervisors may be in the area during applications. Dur4ing the application no person shall be within 100 yards of the area to be treated unless involved in application or mix/load operations. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

Aerial application of Duomax is prohibited.

Changed From "Dormex"

Do not apply this product through any type or irrigation system.

Duomax is a plant growth regulator with well and the start of the system.

Duomax is a plant growth regulator with will stimulate more uniform budbreak on many deciduous plants. More uniform budbreak will occur in plants that have received their fall chill hour requirement or somewhat less than their full Mornancy. Promoting more uniform budbreak in the spring can have significant benefit in promoting more uniform how flowering and more uniform maturity at harvest. The following provides directions on how to achieve these benefits and ow to avoid possible difficulties in the use or Duomax.

This label must be in possession of the user at the time or Duomax application.

EQUIPMENT CONTAMINATION - Spray equipment used for Duomax application should be thoroughly cleaned of residual spray materials. Residual spray in the tank or sprayer plumbing may react with Duomax, potentially reducing the effective concentration of Duomax. Sprays containing metal ions, particularly copper, will form a black insoluble salt that will coat the sprayer and be difficult to remove. More importantly, this reaction will reduce the available active ingredient concentration.

**DORMANT SPRAY EFFECTIVENESS** – Early dormant sprays containing copper should not be followed by Duomax by less than 30 days or the effect of the copper spray may be reduced.

DORMANT SPRAYS CONTAINING OIL - Dormant sprays containing oil should not be made closer than 14 days before or after Duomax application (delayed dormant applications are preferred). Some new wood dieback may result if oil is applied closer than this interval. When oil and copper spray mixtures must be used for insect and/or disease control. Duomax should be applied 30 or more days before normal budbreak and the oil and/or copper spray should be made as a delayed dormant spray, which coincides with early budbreak. This practice will give three or more weeks separation.

COVER CROPS - When spraying Duomax in areas of vineyards or orchards with cover crops, injury may occur from spray applications to the target crop. This injury is usually temporary, but some crops may be sensitive and be defoliated. If there is concern about the cover crop, a test spray of a small area over the cover crop to test the plant sensitivity to Duomax using the intended surfactant is recommended.

POTENTIAL CROP LOSS - Users of Duomax are advised that drift to crops that are in bloom may completely remove or damage all of the flowers, resulting in complete crop loss. When spraying close to susceptible crops, for example, lemons, crops in bloom, sensitive foliage, etc., a buffer zone is suggested to be used. Extreme care must be used to avoid contact of the spray or drift with foliage, green stems, or fruit of desirable crops since sever damage and crop loss changed From "severe" change back may result.

SPRAY DRIFT — Avoid spraying under conditions of a temperature inversion when drift hazard is increased. Coarse sprays are less likely to drift and are recommended to be used in Duomax applications. Do not use nozzles or nozzle configurations which promote fine spray droplets. Do not increase spray volume by increasing nozzle pressure, since this will increase the number of fine droplets in the spray. It is important to understand that the responsibility for control of spray drift is the responsibility of the person making the use recommendation, the applicator and the grower. Read the "Conditions of Sale" on the Duomax label before using this product. If the terms in the "Conditions of Sale" are not acceptable, return the product unopened at once. I added I delete

To limit drift, use a coarse droplet nozzle with nozzle pressure not to exceed 40 psi for dilute boom sprayers and 100 psi for air fan sprayers, and spray only to wet. Do not exceed 40 psi for dilute boom sprayers and 100 psi for air fan sprayers. and spray only to wet. Do not exceed 4 gallons per acre of Duomax per application and make only one application per crop cycle. Do not tank mix with other materials except as listed on this label. If applied less than 30 days (35 to 40 days

for apples) prior to natural budbreak, yield may be reduced. Use the minimum spray volume to achieve adequate wetting of all buds. Do not use concentrate spray.

The use of Duomax may result in the formation of ethylene gas. When the Duomax is applied to grapes growing close to

The use of Duomax may result in the formation of ethylene gas. When the Duomax is applied to grapes growing close to certain lemon varieties the ethylene gas may in turn result in some leaf drop in lemon leaves. This defoliation is characterized by the leaf lamina falling off leaving the leaf petiole still attached to the stem. Application of lime at 125 lbs. in 250-300 gal. water per acre (having a high pH, i.e. 10+), applied 2 to 24 hours after Duomax application, may result in reduced formation of ethylene gas. Again, control of spray drift is the responsibility of the person making the use recommendation, the applicator and the grower.

PRECAUTIONS AGAINST USE OF DUOMAX AS A BLOSSOM THINNER – Duomax is not to be used as a blossom thinner under any conditions because the outcome is unpredictable.

FROST OCCURRENCE PRECAUTION – For earlier than normal budbreak, make the application sooner than 30 days prior to normal budbreak. In determining whether or not to apply Duomax to promote earlier than normal budbreak, the user should be aware that growing buds and shoots are susceptible to frost and may be killed or damaged by freezing temperatures. Following application, some yellowing on the first leaves may appear but the developing growth will be normal.

DORMANCY REQUIREMENTS – To promote the maximum effective of Duomax and to avoid phytotoxicity (i.e., new wood dieback, blossom thinning), deciduous crops must be completely dormant. Duomax is not a substitute for a lack of dormancy. Care should be taken to monitor dormancy. This is most easily accomplished by monitoring chill hour accumulation. USER NOTE: negative chill hour accumulation, climatologically induced incomplete dormancy must be considered, both to promote the effectiveness of Duomax at the recommended rates of application and to avoid phytotoxicity.

ENVIRONMENTAL AND DISEASE STRESS - Plants grown in heavy soils, or in other soils affect5ed by poor drainage, or soil borne diseases, such as phytophthora root rot may die back as a result of treatment with Duomax. This is due to increased uniform budbreak and the inability of the plant to sustain growth. Plants usually appear healthy and begin to grow normally, then collapse. Plants designated for treatment with Duomax need a healthy, viable root system. SPRAY EQUIPMENT CALIBRATION — When calibrating spray equipment, especially speed sprayers, it is critical that equipment be calibrated for the row spacing to be treated. Double spraying and excessive drift through the vineyard/orchard will result in phytotoxocity. Proper speed sprayer calibration and/or reduction of rate will provide a good result.

#### **CROP RECOMMENDATIONS:**

APPLES – To promote more uniform budbreak, after all pruning activities are completed, apply a 4% (v/v) spray in not more than 200 gallons spray per acre using a nonionic surfactant not to exceed 0.5% (v/v), 30 days before normal budswell, or 35 days before normal budbreak. In orchards having more than one variety, spray according to anticipated budbreak timing of the earliest variety in an interplanted orchard, unless each variety can be sprayed separately without significant drift or overspray contacting previously sprayed varieties or nontarget varieties. When budbreak begins to occur, the bloom period can be compressed to a few days depending upon the weather. In order to assure proper pollination, a sufficient number of beehives of suitable strength to assure adequate pollination must be set in the orchard before first blossom activity is observed. Artificial pollination may be advised when bee activity is limited. Increased budbreak uniformity will also facilitate chemical thinning of fruit and promote greater uniformity of fruit maturity at harvest.

Duomax is a budbreak stimulant and will promote more uniform normal and/or earlier budbreak even when the maximum chill hour requirements are met.

Duomax is not a substitute for chill hours, however, a 4% (v/v) spray will stimulate more uniform bud emergence following a minimum amount of chilling (approximately 375-500 chill hours based on the threshold temperature of 43°F to 45°F).

BLUEBERRIES – To promote more uniform budbreak, particularly in areas of marginal chilling, to reduce the period of fruit disease susceptibility and to promote more uniform harvest, use 1.5% (v/v) Duomax in 50 to 100 gallons of spray

"to provide Tull coverage: deleted "flower and vegetative" deleted

per acre using a nonionic surfactant not to exceed 0.5% v/v with applications made 30 or more days prior to natural budbreak.

(In the State of Florida – use of Duomax in Alachua County, Florida is restricted from the area west of Route 441, except that north of the intersection of Route 441 and 175, use is also restricted west of 175 because of possible effects on the squirrel chimney cave shrimp *Palaemonetes cummingi*).

CHERRIES – For more uniform natural budbreak, or for earlier budbreak, leading to more uniform maturity or earlier maturity, apply after all pruning activities are complete, a 4% (v/v) spray in not more than 200 gallons of spray per acre using a nonionic surfactant not to exceed 0.5% v/v. If sufficient spray coverage cannot be achieved on very large trees with 200 gallons spray per acre, do not use Duomax. Applications should be made 30 or more days prior to normal budbreak. Spray applications should be made according to the anticipated budbreak timing required by the earliest variety within an interplanted orchard, unless each variety can be sprayed separately without significant drift or over-spray contacting previously sprayed varieties or non-target varieties. Maintain fungicide/bactericide spray activities, including dormant sprays, and protect bud growth as it occurs.

When budbreak begins to occur following application of Duomax, the bloom can be compressed to a few days, depending upon the weather. In order to accure proper pollination, a sufficient number of beehives of suitable strength to assure adequate polloination must be set in the orchard before first bloom activity is observed. Artificial pollination may be advised when bee activity is limited.

Duomax is a budbreak stimulant and will promote more uniform normal and/or earlier budbreak even when the maximum chill hour requirements are met. However, Duomax is not a substitute for shill hours. A 4% (v/v) spray will stimulate growth following a minimum amount of chilling (approximately 350-500 chill hours based on the threshold temperature of 43°F to 45°F).

GRAPES – WINE AND RAISIN – For promoting increased budbreak uniformity, and to promote more uniform harvest, apply a 4% spray in not more than 100 gallons per acre applied 30 or more days prior to normal natural budbreak. This use will help overcome blind bud disorder on such wine varieties as Cabernet Sauvignon. Low vigor vines may not be able to support the amount of bubreak and shoot growth that occurs as a result of Duomaxuse.

DESERT GRAPES – For use in desert grown grapes in California Counties of Imperial, Riverside and San Bernardino and in Arizona Counties of Maricopa, Pinal and Yuma.

To promote uniform budbreak apply Duomax'as a 4% (v/v) solution is water using a nonionic surfactant not to exceed 0.5% v/v. prior to budbreak after all pruning activities are complete, including tieing of canes. Use a coarse droplet spray with nozzle pressure not to exceed 40 psi. use a minimum number of spray nozzles to achieve adequate wetting. Three to four nozzles are usually sufficient.

Do not exceed 100 gallons of spray per acre and do not use more than 4 gallons Duomax per acre. Make only one application per crop cycle. Do not tank mix with other materials except as listed above. If applied less than four weeks prior to natural budbreak, yield may be reduced.

For earlier than normal budbreak, make the application earlier than 4 weeks prior to normal budbreak but not later than January 31 and not before December 1.

Some yellowing on the first leaves may appear but the developing growth will be normal. In determining to apply Duomax to promote earlier than normal budbreak, the user should be aware that growing buds and shoots are susceptible to forst and may be killed or damaged by freezing temperatures.

To avoid possible exposure to the endangered Coachella Valley fringe-toed lizard in the vineyards located within boundaries of the Coachella Valley Preserve, applications may not be made within 50 feet of the boundary of the Coachella Valley Preserve.

NON-DESERT GRAPES - For use in California Counties of Kern, Tulare, Fresno, and Madera.

To promote uniform budbreak apply Duomax as a 4% (v/v) solution in water using a nonionic surfactant not to exceed 0.5% v/v, prior to budbreak after all pruning activities are completed, including tieing of canes. Use a coarse droplet spray with hozzle pressure not to exceed 40 psi, and a minimum number of spray nozzles to achieve adequate wetting.

changed from "nozzle"
change back
\*changed from "Dormex"

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Three to four nozzles are usually surricient. Do not exceed 100 gallons of total spray per acre and do not use more than 4 gallons Duomax per acre. Make only one application per crop cycle. Do not tank mix with other materials except as listed above. If applied less than four weeks prior to natural budbreak, yield may be reduced.

Some yellowing on the first leaves may appear but the developing growth will be normal. In determining to apply Duomax to promote earlier than normal budbreak, the user should be aware that growing buds and shoots are susceptible to frost and may be killed or damaged by freezing temperatures.

In areas where chill hour accumulation is marginal, Duomax should be applied as late as possible to permit maximum chill hour accumulation, but not later than 25 days before budbreak. Duomax will be most effective using the 4% (v/v) spray solution after the vines have accumulated a minimum of 50 hours of chilling.

Low vigor and low capacity vines should not have Duomax applied any earlier than 30 days prior to anticipated normal budbreak. Vines treated too soon risk reduced yield is conditions affecting growth following application are not favorable for a sustained period.

KIWI (California Only) – To promote more uniform natural budbreak or earlier budbreak, particularly in areas of marginal chilling, to reduce the period of fruit susceptibility to disease, and to promote more uniform harvest, apply a 4% spray, making only one application per crop cycle, in not to exceed 100 gallons per acre. This application will also reduce the canes' susceptibility to apical dominance, therefore increasing bud fruitfulness. Do not tank mix with other materials except up to 0.5% (v/v) of a non-ionic surfactant. If applied less than four weeks prior to natural budbreak, yield may be reduced.

For earlier than normal budbreak, make the application earlier than four wkks prior to normal budbreak.

To limit drift, use a coarse droplet nozzle, nozzle pressure must not exceed 40 psi, and spray to wet. Do not exceed 4 gallons per acre of Duomax per application.

Some yellowing on the first leaves may appear but the developing growth will be normal. In determining to apply Duomax to promote earlier than normal budbreak the user should be aware that growing buds and shoots are susceptible to forst and may be killed or damaged by freezing temperatures.

PEACHES/NECTARINES – (Not For Use in California) – For more uniform natural budbreak, or for earlier budbreak, leading to sharper bloom, more uniform maturity or earlier maturity, apply after all pruning activities are completed, use 1-1.5\$ (v/v) Duomax spray in not more than 200 gallons spray per acre using a nonionic surfactant not to exceed 0.5% v/v. Application should be made 30 ore more days prior to normal budbreak. Application less than 30 days prior to normal budbreak may resuld in reduced yield. In some areas, it may be possible to use lower rates if it is possible to monitor closely the accumulation of chill hours. If rates are too low and made too close to normal budbreak no results may occur.

Spray according to the anticipated budbreak timing of the earliest variety within an interplanted orchard, unless each variety can be sprayed separately without significant drift or overspray contacting previously sprayed varieties or nontarget varieties. If handgun spray applications are used, care must be taken not to over wet the lower portions of the tree because reduced fruitfulness will occur in the lower part of the tree as a result of phytotoxicity from increased spray dripping from the top of the tree. More uniform spray applications occur from speed sprayer treatment, resulting in more uniform distribution of material through the tree.

Duomax is a budbreak stimulant and will promote more uniform and/or earlier budbreak even when maximum chill hour requirements are met. However, Duomax is not a substitute for chill hours. A 1.5% (v/v) spray will stimulate growth following a minimum amount of chilling (approximately 300-500 chill hours based on a threshold temperatures of 43°F to 45°F).

Duomax use on any orchard historically damaged by frost, such as in Southeastern states must be done with the knowledge that Duomax treated trees are equally as frost sensitive as non-treated trees. If Duomax is used to start growth even a few days early, resulting flowers and/or fruit can be subject to frost damage.

\* changed From "Dormex"

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Note to User: Application at rates wexcess of those stated above may reduce emergence of primary beds, causing secondary bud growth which can reduce yield in the immediate crop cycle.

STORAGE AND DISPOSAL

STORAGE: Keep under cool conditions, not to exceed 20°C (68°F). Do not store in direct sunlight.

PROHIBITIONS: Do not contaminate water, food, or feed by storage or disposal. Open dumping is prohibited. Keep pesticide in original container — Moved From the "PESTICIDE STORAGE"

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or an an approved waste disposal facility.

CONTAINER DISPOSAL: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

#### CONDITION OF SALE

1. Green Trees and Plants II LLC. warrants that this product consists of the ingredients specified and is reasonably fit for the purpose stated on this label when used in accordance with the directions under normal conditions of use. No one other than an officer of Green Plants and Trees II LLC. is authorized (and such authorization must be in writing) to make any other warranty, guarantee or direction concerning this product.

 Because the time, place, rate of application, weather conditions and normal or abnormal conditions of use or storage are beyond Green Trees and Plant's control, Green Trees and Plant's liability is limited to replacement of product or refund of purchase price. In no event shall Green Trees and Plant's be liable for indirect or consequential damages.

MANUFACTURED FOR
Green Trees and Plants II LLC.
250 Lawrence St.
Marietta GA 30060

to the extent consistent with applicable law

\*changed From "DEGUSSA AG", "DEGUSSA", or "DEGUSSA's"



Due to corresive effects to eyes and skin

For retail sale to and use only by Certified Applicators or persons under their direct supervision and only for those uses covered by the Certified Applicator's Certification,

A growth regulator for stimulating uniform budbreak:

ACTIVE INGREDIENT B	Y WEIGHT
Hydrogen Cyananide	
OTHER INGREDIENTS.	50.00%
TOTAL	. 100.00%

4.3 LBS. ACTIVE INGREDIENT PER GALLON

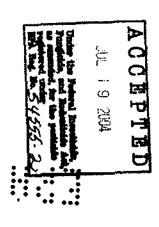
U.S PATENT 4,487,625

#### KEEP OUT OF REACH OF CHILDREN **DANGER - PELIGRO**

Si used no entiends is etiqueta, busque a niguien para que se la explique a usted en detalle.

(If you do not understand this label, find someone to explaim it to you in detail.)

	FIRST AID	
lf on skin or clothing	Take off contaminated clothing.  Ringe skip immediately with plenty of water for 15-20 minutes.  Call poison control center or doctor for treatment advice.	
If inhaled	Move person to fresh air.     If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably month-to-mouth, if possible.     Call a polson control center or doctor for further treatment advice.	
If in eyes	Field eye open and rinse slowly and gently with water for 15-20 minutes.     Resneve contact lenses, if present, after the first 5 minutes, then continue rinsing eye.     Call a poison control center or doctor for treatment advice.	1 9 2004 5 4 5
if swallowed	Call poison control center or doctor immediately for treatment advice.  Fia ve person sip a glass of water if able to swallow.  Do not induce vomiting unless told to do so by a poison control center or doctor.  Do not give anything by mostle to an unconscious person.	
NOTES:	Allaws the product container or label with you whou calling a poison control center or doctor or going for treatment.  -In the event of a medical emergency, you may also contact the National Posticide (afformation Center at 1-800-858-7378).	



#### **NOTE TO PHYSICIAN**

- · Issuedista lavage of stomack.
- Hydrogen cyanamide is not hydrogen cyanide and does not degrade to hydrogen cyanide. Do not induce vomiting or give anything by mouth to an enconscious person.

1000-90

MANUFACTURED BY DECINSA AG DE3303 TROSTBERG, GERMANY P.O.B. 1263

BATCH NO.
NET CONTENTS GALS.

LITERS

EPA REG. No. 54555-2

## PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS DANGER

Corrosive, causes eye and skin damage. May be fatal if swallowed or absorbed through skin. Do not get in eyes, on skin or on clothing. Do not breathe spray mist. If a skin rash develops as a result of exposure to DORMEX, avoid exposure to the material or its spray drift, some people may develop a sensitivity to DORMEX. Avoid contamination of food and feed.

#### PERSONAL PROTECTIVE EQUIPMENT

Some materials that are chemical-resistant to this product are listed below. If you want more options, follow the instructions for category C on an EPA chemical resistance category selection chart.

#### APPLICATORS AND OTHER HANDLERS MUST WEAR:

- Chemical-resistant protective suit
- Chemical-resistant gloves such as Barrier Laminate, or Butyl rubber ≥ 14 mils, or Nitrile Rubber ≥ 14 mils, or Neoprene Rubber ≥ 14 mils, or Polyvinyl Chloride (PVC) ≥ 14 mils, or Viton ≥ 14 mils
- · Chemical-resistant footwear plus socks
- Protective eyewer persons who mix, load or transfer must wear goggles. A full-faced respirator may be substituted for goggles.
- · Chemical-resistant headgear for overhead exposure
- · Chemical-resistant apron when cleaning equipment, mixing, or loading
- A respirator with either an organic-vapor-removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C), or a canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G)

#### USER SAFETY REQUIREMENTS:

- No Alcoholic beverages. Do not consume alcoholic beverages prior to, during, and following (24 hours) handling this product.
- Dispose of Contaminated Clothing. Discard clothing and other absorbent materials that have been drenched or heavily contaminated with liquid from this product. Do not reuse them.
- Clean and maintain PPE: Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry. Wash PPE after each day's use.

#### **ENGINEERING CONTROLS STATEMENTS:**

- Closed Systems: This product must be mixed, loaded, and transferred only in a closed system.
- Closed Systems and Enclosed Cab Requirements (if applicable): This product must be applied only with the applicator in an enclosed cab. The closed system and enclosed cab must be used in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides (40 CFR 170.240(d)(4-6)). The handler PPE requirements may be reduced or modified as specified in the WPS.
- The operating pressure of the spray rig shall be no more than 40 psi with the use of low pressure nozzles on dilute boom sprays and no more than 100 psi on sirfan sprayers.

  Airfan sprayers should have the fan adjusted so that the spray mist does not greatly exceed the top of vines being sprayed.



#### **USER SAFETY RECOMMENDATIONS:**

#### Users should:

- Wash hands before enting, drinking, chewing gum, using tobacco, or using the toilet.
- · Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- . Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.
- Avoid contact with spray contaminated surfaces.

#### ENVIRONMENTAL HAZARDS:

Do not apply this product to any area in which an endangered species has been identified or in such a manner that drift from applications of this product could result in destroying an endangered species. This limitation applies only to areas that have been identified by and are protected by State and Federal agencies. Do not apply closer than 300 yards to the mean high water mark for intertidal areas or closer than 300 yards to surface water. Do not apply to crops growing closer than 300 yards to rivers, streams, or their flowing tributaries. Do not contaminate water by the cleaning of equipment or disposal of equipment washwater or rinsate. Do not apply when weather conditions favor drift from treated areas or where rumoff is likely to occur. Do not spray when bees are active in the field.

This chemical can contaminate surface water through ground spray applications. Under some conditions it may also have a high potential for runoff into surface water application. These include poorly draining or wet soils with readily visible slopes toward adjacent surface waters, frequently flooded areas, areas overlaying extremely shallow ground water, areas with in-field canals or ditches that drain to surface water, areas not separated from adjacent surface waters by vegetated filter strips, and areas overlaying tile drainage systems that drain to surface water. This posticide is highly toxic to freshwater invertebrates and moderately toxic to birds and mammals. Drift and runoff may be hazardous to aquatic organisms in neighboring areas.

#### DIRECTIONS FOR USE

It is a violation of federal law to use this product in a manner inconsistent with its labeling.

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers or protected supervisors may be in the area during application. During the application no person shall be within 100 yards of the area to be treated unless involved in application or mix/load operations. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

Aerial application of Dormex is prohibited.

Do not apply this product through any type of irrigation system.



#### AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, numeries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE), notification to workers, and restricted-entry inservals. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted entry interval (REI) of 72 hours.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil or water, is:

- · Chemical-resistant protective suit
- Chemical-resistant gloves, such as Barrier Laminate, or Butyl Rubber ≥ 14 mils, or Nitrile Rubber ≥ 14 mils, or Neoprene Rubber ≥ 14 mils, or Polyvinyl Chloride (PVC) ≥ 14 mils, or Viton ≥ 14 mils
- Chemical-resistant footwear plus socks
- . Protective evewear persons who mix, load or transfer must wear goggles. A full-faced respirator may be substituted for goggles.
- Chemical-resistant headness for overhead exposure.

Notify workers of the application by warning them orally and by posting warning signs at entrances to treated areas.



## Aerial application of Dormen is prohibited. DIRECTIONS FOR USE - Cent'd

Domest is a plant grantle regulater store uniform by describious plants. More uniform backets, will accur in plants that have received their full table to the spring can be somewhat has the spring can be somewhat has the spring can be somewhat in promoting more uniform share uniform states uniform the same unif

Their behal smark by in pranceation of the ener of the time of Dormer, application.

EQUIPMENT CONTAMINATION - Speny equipment used for Dermes application should be thereughly cleased of residual gray majorials. Residual apray to the mais or sprayer planthing rmy react with Dermen, portunishly reducing the officetive concentration of Darones. Sprays containing meast torus, particularly copper, will form a black innotable and that will cont the sprayer and be difficult to remark. More importunity, this eraction

DORMANT SPRAYS CONTAINING OIL - Decreat spary containing oil should not be made clear than 14 days before or other Decreat specialists (school decreat applications are professed). Some new wood capter most family threat made in a decreat made in a decreation of the decreation in a decreation in DORMANT SPRAY EFFECTIVENESS -- Early document sprays containing cappes should not be killiouned by Durmen by less than 30 days or the office of the capper spray way be reduced.

COVER CROPS - When proving Docum, it were of visageste of sectands with cover rrope, injury may occur from 19789 applications to the major of usually jumper of a seal the cover crope to test the pinet of the cover crope and the crope and the cover crope and the cr PCTENTIAL CROF LINES - Liver of Dorman men advined that dieth to coope that are in bloom may completely vanione or damage all the flowers, remeiting in complete crop feat. When apraying clear to authorities for comment, haven, enter in biscon, seasitive foliage, etc., a buffer zone is augmented to be used. Buttoner case must be used to aread contact of the apret or chief with foliage, press stems, or finite of desirable crops stems.

SPRAY DRIFT — Avoid spraying under conditions of a temperature inversion when third hazard is increased. Course apral has likely to drift and are recommended to be used in Durman applications. For not use the company drift is not consistent to make the property of the possess applications are the property of the possess making the new temperature of the increase the temperature of the increase o

PROST OCCURRENCE PRECAUTION - For enthicrition across the application access than 30 days prior to account bathous. In determining whether or not to apply Documen to promote cartier PRECALTIONS AGAINST USE OF DORMEX AS A BLOSSOM THINNER. Dormes is not to be used as a decision index may conditions because the conceases suggestionals.

then normal buckness, the same threats he seemed because the proving bush and should are encouplible to from and any be killed or chanaged by through transcentance. Following application, some yellowing on the first traves may appearance.

that the developing grands with he named to ensurement officients of Dormer and to are displacement of the entering of the ensurement of Dormer and to are displacement of the entering of the EXVIRCNMENTAL, AND DESLAGE STRESS - Thank grown in heavy soils, or in other noise afficient by proce challenge, or usid horne chemistry, next as physician backward uniform backward and the institute in manufacture in market provide. Plants countily, and togeth to grow normally, then collapse. Plants training the transfer with Dorman mond

SPRAY EQUIPMENT CALIBRATION - When culturating speny equipment, especially append apergoon, it is ordical that equipment be calibrated for the new special to be trusted. Double spraying and emassive delta

# CROP RECOMMENDATIONS:

LESS.—To present more uniform bushred, afor at present and constituted, apoly a 4% (1/1/) spray in not more than 200 gallons spray per acro uning a nondonic narticism and to exceed the second to the control of the control of the second to the control of the con

that is a buildensk stimulust and will promise more uniform merusel under restine buildress, even when the maximum chill hour manicements are met.

Dormer, is not a substitute for chill bours, however, a 4% (v/v) spory will stimulate more uniform but emergence following a minimum amount of chilling (approximately 375-500 chill bours based on the threshold temperature of

BLUEBERRIES - To promote more uniform buddencie, particularly in areas of marginal childreg, to reduce the time period of fruit discuss susceptibility and to promote more uniform barvest, use 1.5% to 3.0% (v/v) Donner, in 50 to 100 pallons of apray per note to provide full coverage. Use a uniform surfacture not to exceed 0.5% e/v with applications made 30 or more days prior to amusing discuss the buddencie.

hands sufficient granded to be additional branking off hat your things. The higher rate is required your fallings in his bound off. In color is practical training of the your fallings has been done to be added to be a sufficient of the best of the color of the color of the color falling of the your fallings has been done to be desirable. This later practice is practically a latter than and falling falling the practice of the color of the color

Market general's supprinted by the state of the state of

(in the State of Plorida - use of Dorman, in Alechan county, Florida is restricted from the arm west of route 441, except that north of the intersection of route 441 and 175, use is also restricted west of 175 because of possible effects as the squired chiencey cave shring Indicated translated.)

CHERRIES - For more uniform natural budbrenk, or for earlier budbrenk, bading to more uniform normal maturity or certifer maturity, apply after all pruning activities are complete, a 4% (vV) apeny in not more than 200 gallons of agenty per acre. do not use Dormen. Applications should be made 20 or more days prior to morean budbrenk. Spray applications about he made according to the maticipated budbrenk timing required by the enthiest variety within an interplanted orchard, unless each variety can be uprayed approach applications about he made according to the maticipated budbrenk timing required by the enthiest variety without air interplanted orchard, unless each variety can be uprayed approach approach and protect bud growth as it occurs.

When businesk begins to occar following appleasion of Dornes, the bloom can be compressed to a few days, depending upon the weather. In order to sesure proper politization, a sufficient insurber of bechives of subside struggle survey in the occurrent. Artificial politization may be activity in limited.

Domme, is a bufferest stimulant and will promote more veriform memual and/or carlier bufferest even when the maximum child hour requirements are not. However, Dommer is not a substitute for child hours. A 4% (v/v) army with minustate provets following a minimum amount of childing (approximately 350-500 child hours based on the threshold temperature of 43% to 45%.).

CRAPES - WINE AND RAIGIN -- For promoting increased buildwork uniformity, and to promote make uniform harvest, apply a 4% apray in not more than 100 gallons per new applied 30 or more days prior to normal suddens. This use will halp overcome bind bad disorder on such wine varieties as Cabernet Sarvignon. Low vigor vines may not be able to support the sencent of buildwark and shoot growth that occurs as a result of Dormon use.

Dormon use.

DESERT CHAPES — For use in desect grown grapes in Chiffornia Counties of Imperial, Riverside and San Benaemino and in Arizona Counties of Maricopa, Final and Yuna.

To promote uniform budbreak apply Domes: as a 4% (v/v) solution in water using a nominal action set to cacced 0.5% v/v, prior to budbreak after all premises are completed, including ticing of cauce. Use a counter despite to make nonzele pressure not to cacced 40 pai. Use a minimum member of spray notates to action Acquise withing the four transless are usually sufficient.

weeks prior to assume budbrent, yield may be reduced.

For earlier than sommel budbrent, yield may be reduced.

For earlier than sommel budbrent, will may be reduced.

For earlier than sommel budbrent, make the prior to normal budbrent but not later than language that the second of the developing growth will be normal. In determining to apply Dormer to promote earlier than normal budbrent, the user should be aware that growing buts and shoots are normal budbrent, the user should be aware that growing buts and shoots are normal budbrent, the user should be aware that growing buts and shoots are normal budbrent, the user should be aware that growing buts and shoots are normal budbrent, the user should be aware that growing buts and shoots are normal budbrent, the user should be aware that growing buts and shoots are normal budbrent, the user should be aware that growing buts and shoots are normal budbrent, the user should be aware that growing buts and shoots are considered by alloy frings tood brand in the wineyards located within boundaries of the Coachella Valley Freserve, applications may not be made within 50 feet of the boundary of the Coachella Valley Freserve.

) ,

NON-DESERT GRAPES - For use is California Cousties of Korn, Twiner, Presso, and Medora.

To promote uniform buddersk apply Dounce as a 4% (v/v) anistion in water uning a sociolouic numberses to 5% v/v, prior to buddersk after all pruning activities are completed, including ticing of case. Use a control decided speak with social potential profession per corp of and their such speak of the minimum potential purposes. Notice only one application per comp oycle. Do not their such such anison at their such above. If applied has then from words prior to natural buddersk, yield may be

For earlier time accessed, make the application earlier than 4 words prior to normal budderst, but not their time Reformary 22 and not before James and application on their time developing growth will be nound. In determining to apply Dornes to premote testion than normal budderst, the user about the sware that proving buts and shoots are managed by freezing temporatures.

he areas where chill hour socuredates is marginal. Dormer should be applied as late as postable to permit maximum chill hour accumulation, but not later than 25 days before budkerak. Dormer will be most effective using the 1.5% (v/v) apara solution after the visua have accumulated a minimum of 30 hours of childing.

Low vigor and low opposity visua should not have Dormer applied may earlier than 30 days prior to anticipated norms budkerak. Visua treated too soon risk reduced yield if conditions affecting growth following application are

not favorable for a nastained period

KIWI (California Only) - To promote more uniform matural bucherest or earlier buchreats, particularly in areas of marginal chilfing, to reduce the period of fruit susceptibility to disease, and to promote more uniform harvest, apply a 4% spray, anking only one application per crop cycle, in not to exceed 100 gallons per acre. This application will also reduce the cases' susceptibility to apical dominance, therefore increasing bad fruitfulnes. Do not and that had been assessed to a social and application cartier than four words prior to normal budbreak, yield may be reduced.

For cartier than annual budbreak, make the application cartier than four words prior to normal budbreak.

To liank daith, use a coasse droplet mexite, notice may not exceed 40 psi, and apray to wet. Do not exceed 4 gallons per acre of Dormex per application.

Souss yellowing on the last should be aware that growth will be normal. In determining to apply Dormex than normal budbreak the user should be aware that growing bude and should are

susceptible to freet and may be killed or demaged by freezing temperatures.

PEACHES/NECTARINES . (Not For the in California) - For more uniform takend to for earlier budbreat, leading to starper bloom, more uniform party or acre uniform takend, leading to starper bloom, more uniform spiry in not more than 200 gallous spiry per acre using a nonlocific nutherate not to exceed 0.5% viv. Application should be made 30 or more than 200 gallous spiry per acre using a nonlocific nutherate not to exceed 0.5% viv. Application should be made of the normal budbreak may ment in reduced yield. In some area, it may be possible to me tower rates if it is possible to mostific closely the normalisation of chill hours. If rates are too low and made too close to exempt the results may occur.

Spary according to the analogusted buildness training of the conflect variety widths an interpleted orchard, unless each training and sparyed expensively without significant dail or oversport contacting proviously sprayed varieties or new in the laws man to the tree as a result of physicionician will occur in the lower part of the tree as a result of physicionician from speed approve treatment, resulting in more uniform distribution of material through the tree. More uniform applications occur from speed approve treatment, resulting in more uniform distribution of material through the tree.

Donnes, is a builbring and will promote more uniform and/or earlier builbring creat when maximum chill hour requirements are met. However, Donnex is not a substitute for chill hour. A 1.5% (v/v) apmy will stimulate growth following a minimum amount of chilling (approximately 300-500 chill hours based on a threshold temperature of 43°F, to 45°F).

Domest use on any occlosed historically described by frust, such as in Southeastern states must be done with the knowledge that Domest treated trees are equally as frost straight described from . If Domest is used to start growth even a few days barby, remelting flowers seaffor finit can be subject to frost channels.

Nage to User: Application at rates to excess of those stated above may reduce emergence of primary back, causing accordary bud growth which can reduce yield in the immediate corp cycle.

## STORAGE AND DISPOSAL

PROHIBITIONS: Do not commisses water, food, or feed by storage or disposal

PESTICIDE STORAGE: Keep under cool conditions, not to exceed 20°C (68°F). Do not store in direct numbles. Keep penticide in original container.

PESTICIDE DISPOSAL: Water newking from the use of this graduct may be disposed of on site or at an approved water disposal facility. Open dumping is probibited.

CONTAINER DISPOSAL: Triple rines (or opuivalent). Then offer for recognishening, or puncture and delignose of its a sentiarry landfill, or by forcineration, or, if allowed by state and focal methorities, by truming. If turned, stay out of smoke.

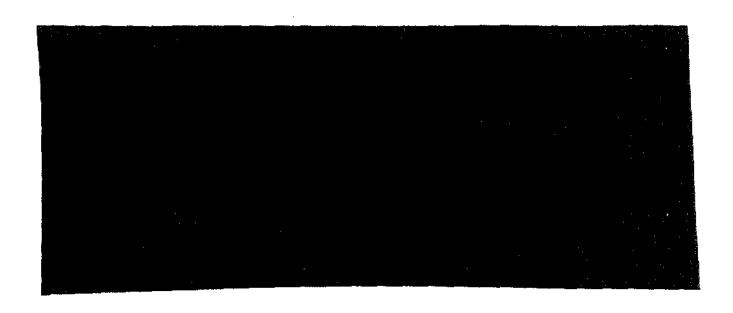
## CONDITION OF SALE

- DECLESSA AG warmens that this product consists of the ingredients are its reasonably fit for the purpose mand on their label when used in accordance with the directions under normal conditions of use. No one other than an edition of DECLESSA is authorized (and such authorization mant be in writing) to make may other warmenty, generated concerning this product.

  Because the time, place, rate of application, weather conditions and normal conditions of use or storage are beyond DECLESSA's control, DECLESSA's Hability is limited to replacement of product or refund of purchasis gries. In no event shall DECLESSA be liable for infirent or consequential demages.
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Page is not included in this copy.	
Pages 69 through 72 are not included in this copy.	,
	<u> </u>
The material not included contains the following information:	, type of
Identity of product inert ingredients.	
Identity of product impurities.	
Description of the product manufacturing process	
Description of quality control procedures.	
Identity of the source of product ingredients.	
Sales or other commercial/financial information.	
A draft product label.	
The product confidential statement of formula.	
Information about a pending registration action.	
FIFRA registration data.	
The document is a duplicate of page(s)	
The document is not responsive to the request.	
Internal deliberative information.	
<u>x</u> Attorney-client communication.	
Claimed confidential by submitter upon submission Agency.	ı to the
Personal privacy Information	

The information not included is generally considered confidential by product registrants. If you have any questions, please contact the individual who prepared the response to your request.



---- Forwarded by John Bazuin/DC/USEPA/US on 03/13/2008 02:05 PM ----

Matthew Brooks <a href="mailto:smbrooks01@yahoo.com">mbrooks01@yahoo.com</a> 03/12/2008 09:49 PM

To John Bazuin/DC/USEPA/US@EPA cc

Subject Duomax Registration 84374-R

Hi John

I hope this is moving forward soon. Attached find revised matrix pages based on our dicussion. I've also attached a draft letter for Trostberg that my client has ok'ed. As soon as you're satisfied with the matrix I will sign and send you the attached pages and sign and send this letter to Trostberg.

I am out of town next week so if there's any chance of doing these activites Friday that would be really great. Hope all is well and talk to you soon.

Sincerely Matt Brooks

Matthew Brooks, Ph.D.

703-266-0128 Phone 703-266-4377 Fax mwbrooks01@yahoo.com

Page is not included in this copy.
Pages 75 through 76 are not included in this copy.
The material not included contains the following type of information:
Identity of product inert ingredients.
Identity of product impurities.
Description of the product manufacturing process.
Description of quality control procedures.
Identity of the source of product ingredients.
Sales or other commercial/financial information.
A draft product label.
The product confidential statement of formula.
Information about a pending registration action.
FIFRA registration data.
The document is a duplicate of page(s)
The document is not responsive to the request.
Internal deliberative information.
x Attorney-client communication.
Claimed confidential by submitter upon submission to the Agency.
Personal privacy Information

The information not included is generally considered confidential by product registrants. If you have any questions, please contact the individual who prepared the response to your request.



## Matthew Brooks <mwbrooks01@yahoo.com> 03/17/2008 10:34 PM

To John Bazuin/DC/USEPA/US@EPA

CC

bcc

Subject duomax registration

Hi John
Is this going Ok?
I'm out this week so I guess we'll have to finish everything early next week.
-Matt

Matthew Brooks, Ph.D. 703-266-0128 Phone 703-266-4377 Fax mwbrooks01@yahoo.com

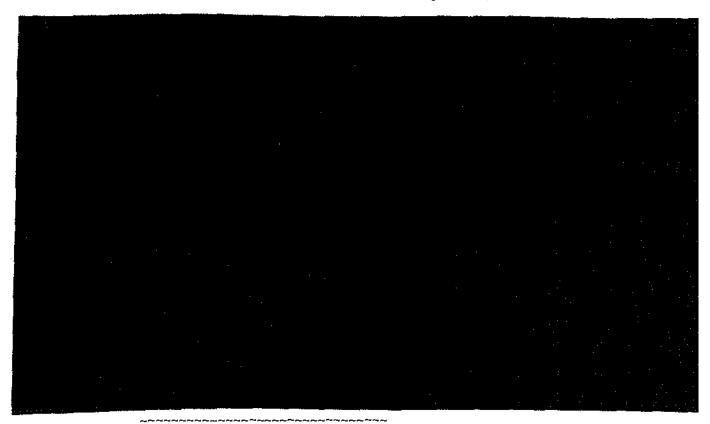


John Bazujn/DC/USEPA/US 03/13/2008 02:05 PM To Michele Knorr/DC/USEPA/US

cc Tony Kish/DC/USEPA/US

bcc

Subject Fw: Duomax Registration 84374-R



---- Forwarded by John Bazuin/DC/USEPA/US on 03/13/2008 02:05 PM -----



Matthew Brooks <mwbrooks01@yahoo.com> 03/12/2008 09:49 PM

To John Bazuin/DC/USEPA/US@EPÁ

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Matthew Brooks, Ph.D. 703-266-0128 Phone 703-266-4377 Fax





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8570-35-Efate and Ecotox2-cya-r-revmar2008.pdf

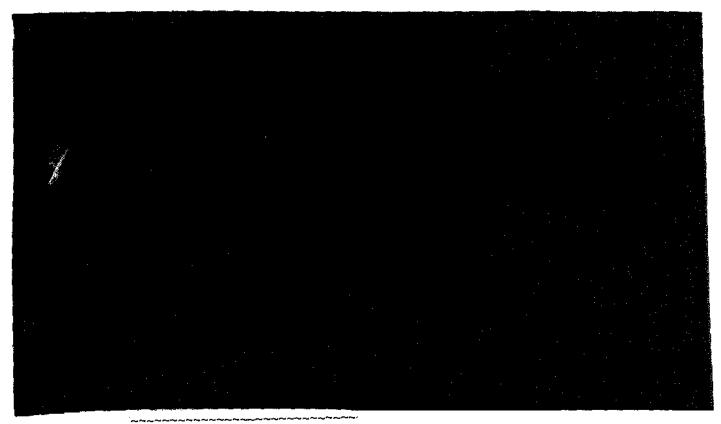


John Bazuin/DC/USEPA/US 03/13/2008 02:05 PM To Michele Knorr/DC/USEPA/US

cc Tony Kish/DC/USEPA/US

bcc

Subject Fw: Duomax Registration 84374-R



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To John Bazuin/DC/USEPA/US@EPA

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8570-35-Efate and Ecotox2-cya-r-revmar2008.pdf



## Matthew Brooks <mwbrooks01@yahoo.com> 03/12/2008 09:49 PM

To John Bazuin/DC/USEPA/US@EPA

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bcc

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mwbrooks01@yahoo.com offer to pay- trostberg.doc 8570-35-Ecotox-cya-r-revmar2008.pdf

8570-35-Efate and Ecotox2-cya-r-revmar2008.pdf



#### Ag-Chem Consulting

Pesticide Science and Registration 12208 Quinque Lane, Clifton VA 20124 (703) 266-0128 Phone (703) 266-4377 Fax mwbrooks01@yahoo.com

March 3, 2008

To:

Eric Andreas

Wiley Rein LLP

Attorney for AlzChem trostberg GmbH

SUBJECT:

Registration of End Use Product Containing 50% hydrogen Cyanamide

Offer to Pay Compensation

Dear Mr. Andreas;

Ag-Chem Consulting, on behalf of Green Trees and Plants LLC, has submitted an application to register an end use product containing hydrogen cyanamide. The source of the hydrogen cyanamide is unregistered. We have utilized the selective citation method for completing the generic requirements for the technical source and for the required six acute toxicology studies for the end use product.

Our initial submission last year utilized the studies submitted by Trostberg to obtain its original registration in 1993, consequently all were more than 15 years. In subsequent discussions with the EPA, the following studies have been determined to be required and have been added to the data matrix:

MRID	Guideline	Title	Date Submitted
44076701	72-4	Early Life-Stage Toxicity of Hydrogen cyanamide to the rainbow trout under flow-through conditions	August 5, 1996
44076702	72-4	Chronic Toxicity of Hydrogen Cyanamide to Daphnia magna under flow through conditions	August 5, 1996
44804702	72-3	Hydrogen Cyanamide: A 96 hour flow through acute toxicity test with sheepshead minnow	April 19, 1999
44804704	72-3	Hydrogen Cyanamide: A 96 hour shell deposition test with the eastern oyster	April 19, 1999
44804703	72-3	Hydrogen Cyanamide: A 96 hour flow through acute toxicity test with Saltwater Mysid	April 19, 1999

Since your company is listed as the data submitter, we are supplying this notice as required by our use of selective cite under FIFRA.

Persuant to FIFRA  $3\mathbb{O}(1)(F)$ , Green trees and Plants LLC offers to pay compensation for the data cited above and owned by your company and submitted to EPA, to the extent required hy law and enter into negotiations to determine which data, if any, may be subject to compensation and the amount and terms of any compensation due.

To the extent that you feel your company is owed compensation, please provide us with the following information so that we may evaluate your claims:

- 1- Laboratory where study was completed
- 2- Actual Cost of Study
- 3- Compensation received to date for study.



Additionally, the following studies are being cited; however according to the Agency, they have never been reviewed. Consequently compensation can't be determined at this time since it is not possible to determine if the submitted item was a valid study. If the study is subsequently determined to be unacceptable, Green Trees will be forced to complete the study themselves to maintain the registration. If in the future they are reviewed and accepted, Green Trees agrees to negotiate with Trostberg until a compensation amount for each accepted study can be reached.

MRID	Guideline	Title	Date Submitted
45797201	71-4	Cyanamide 50% Solution to determine effects on reproduction in bobwhite quail	Sept 10, 2002
45380701	122-1	Effects of Cyanamide on Vegetative nontarget Plant Species	April 17, 2001
45380702	122-1	Effects of Cyanamide on Seedling Emergence	April 17, 2001
45382201	122-2	Toxicity of cyanamide to anabaena flos-aquae in an algal growth inhibition test	April 18, 2001
45406601	122-2	Tox of Cy L 500 to Pseu. Sub. 96 hr. algal inhibition	April 18, 2001
45406602	122-2	96 hr. Algal Growth Inhibition	April 18, 2001
45382202	162-4	Aerobic aquatic Degradation	April 18, 2001

Lastly, in a letter from you to the EPA dated January 17, 2008, you noted several additional studies. After exhaustive agency review, it was concluded that these studies were neither required nor relied upon to obtain or maintain the federal registration for hydrogen cyanamide. It is possible that some of these studies may be required by specific states for registration in that state. Green Trees and Plants will of course offer compensation should they be required to cite these studies for state registrations.

If you have any questions please contact Dr. Matthew Brooks, Ag-Chem Consulting, LLC, 12208 Quinque Lane Clifton VA.

Thank you. Very Sincerely,

Matthew Brooks, Ph.D.
Director, Ag-Chem Consulting
An Authorized Representative for Green Trees and Plants



FY



#### Ag-Chem Consulting

Pesticide Science and Registration 12208 Quinque Lane, Clifton VA 20124 (703) 266-0128 Phone (703) 266-4377 Fax mwbrocks01@yahoo.com

March 3, 2008

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Our initial submission last year utilized the studies submitted by Trostberg to obtain its original registration in 1993, consequently all were more than 15 years. In subsequent discussions with the EPA, the following studies have been determined to be required and have been added to the data matrix:

MRID	Guideline	Title	Date Submitted
44076701	72-4	Early Life-Stage Toxicity of Hydrogen cyanamide to the rainbow trout under flow-through conditions	August 5, 1996
44076702	72-4	Chronic Toxicity of Hydrogen Cyanamide to Daphnia magna under flow through conditions	August 5, 1996
44804702	72-3	Hydrogen Cyanamide: A 96 hour flow through acute toxicity test with sheepshead minnow	April 19, 1999
44804704	72-3	Hydrogen Cyanamide: A 96 hour shell deposition test with the eastern oyster	April 19, 1999
44804703	72-3	Hydrogen Cyanamide: A 96 hour flow through acute toxicity test with Saltwater Mysid	April 19, 1999

Since your company is listed as the data submitter, we are supplying this notice as required by our use of selective cite under FIFRA.

Persuant to FIFRA 3©(1)(F), Green trees and Plants LLC offers to pay compensation for the data cited above and owned by your company and submitted to EPA, to the extent required by law and enter into negotiations to determine which data, if any, may be subject to compensation and the amount and terms of any compensation due.

To the extent that you feel your company is owed compensation, please provide us with the following information so that we may evaluate your claims:

- 1- Laboratory where study was completed
- 2- Actual Cost of Study
- 3- Compensation received to date for study.

Additionally, the following studies are being cited; however according to the Agency, they have never been reviewed. Consequently compensation can't be determined at this time since it is not possible to determine if the submitted item was a valid study. If the study is subsequently determined to be unacceptable, Green Trees will be forced to complete the study themselves to maintain the registration. If in the future they are reviewed and accepted, Green Trees agrees to negotiate with Trostberg until a compensation amount for each accepted study can be reached.

MRID	Guideline	Title	Date Submitted
45797201	71-4	Cyanamide 50% Solution to determine effects on reproduction in bobwhite quail	Sept 10, 2002
45380701	122-1	Effects of Cyanamide on Vegetative nontarget Plant Species	April 17, 2001
45380702	122-1	Effects of Cyanamide on Seedling Emergence	April 17, 2001
45382201	122-2	Toxicity of cyanamide to anabaena flos-aquae in an algal growth inhibition test	April 18, 2001
45406601	122-2	Tox of Cy L 500 to Pseu. Sub. 96 hr. algal inhibition	April 18, 2001
45406602	122-2	96 hr. Algal Growth Inhibition	April 18, 2001
45382202	162-4	Aerobic aquatic Degradation	April 18, 2001

Lastly, in a letter from you to the EPA dated January 17, 2008, you noted several additional studies. After exhaustive agency review, it was concluded that these studies were neither required nor relied upon to obtain or maintain the federal registration for hydrogen cyanamide. It is possible that some of these studies may be required by specific states for registration in that state. Green Trees and Plants will of course offer compensation should they be required to cite these studies for state registrations.

If you have any questions please contact Dr. Matthew Brooks, Ag-Chem Consulting, LLC, 12208 Quinque Lane Clifton VA.

Thank you. Very Sincerely,

Matthew Brooks, Ph.D.
Director, Ag-Chem Consulting
An Authorized Representative for Green Trees and Plants





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	DATA	A MATRIX			
Date March 3, 2008	Date March 3, 2008				Page 5 of 15
Applicant's/Registrant's Name & Address Green Trees end Plants II, LLC, 12208 Quinque Lane, Clifton VA 20124		Product OuoMax			
Ingredient Hydrogen Cyanamide					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
71-1	Avian Acute Oral- Bobwhite Quail	00153783	Alzchem Trostberg GMBH	Old	
71-1	Avian Acute Oral- Mallard	00153784	Alzchem Trostberg GMBH	Old	
71-2	Avian Dietary LC50-Bobwhite Quait	00153785	Alzchem Trostberg GMBH	Old	
71-2	Avian Dietary LC50-Mallard	42178401	Alzchem Trostberg GMBH	Old	
71-2	Avían Dietary LC50-Bobwhite Quail	42178402	Alzchem Trostberg GMBH	Old	
72-1	Acute Toxicity- Rainbow Trout	00148043	Alzchem Trostberg GMBH	Old	
72-1	Acute Tox-Fish	00148044	Alzchem Trostberg GMBH	Old	
72-2	Acute Tox- Daphnia	00148046	Alzchem Trostberg GMBH	Old	
72-1	Acute Tox- Bluegitl	00153786	Alzchem Trostberg GMBH	Otd	
72-4	Early Life Stage-Trout	44076701	Atzchem Trostberg GMBH	PAY	
72-4	Chronic Toxicity to Daphnia	44076702	Alzchem Trostberg GMBH	PAY	
72-3	96hr Flow-Through Sheepshead Minnow	44804702	Alzchem Trostberg GMBH	PAY	
72-3	96hr Shetl Deposition	44804704	Alzchem Trostberg GMBH	PAY	
72-3	96 hr acute tox w/sattwater mysid	44804703	Alzchem Trostberg GMBH	PAY	
Signature			Name and Title  Dr. Matthew Brooks, Director		Date : 3/13/08





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		DATA MATRIX			
Date March 3, 2008  Applicant's/Registrant's Name & Address		EPA Reg No./File Symbol		Page 5 of 15	
		Product			
Green Trees and Plants II, LLC, 12	2208 Quinque Lane, Clifton VA 20124		DuoMax		
ngredient Hydrogen Cyanamide					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Alzchem Trostberg GMBH	Old	
			Alzchem Trostberg GMBH	Old	
			Aizchem Trostberg GMBH	Old	
			Alzchem Trostberg GMBH	Otd	
			Alzchem Trostberg GMBH	Old	
			Alzchem Trostberg GMBH	Old	
			Atzchem Trostberg GMBH	Otd	
			Alzchem Trostberg GMBH	Otd	
			Alzchem Trostberg GMBH	Old	
			Alzchem Trostberg GMBH	PAY	
			Alzchem Troslberg GMBH	PAY	
			Aizchem Trostberg GMBH	PAY	
			Alzchem Trostberg GMBH	PAY	
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ignature			Name and Title	·······	Date
			Dr. Matthew Brooks, Director		3/13/08



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PL: The study is in the public literature.

PAY: I have notified in writing the Original Data Submitter or, if the cite-att method is used, all companies tisted in the most current Data Submitters List for this ingredient, and have offered

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to be paid for the use of the study(ies).

GAP: This Guideline data requirement is a data gap as defined in 40 CFR sections 152.83(a) and 152.96.

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uses for which the purchased EPA registered ingredient is not supported, additional data must be submitted or cited here to support those uses.

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		DATA MATRIX			
Date March 3, 2008			EPA Reg No /File Symbol		Page 5 of 15
Applicant's/Registrant's Name & Ad Green Trees and Plants II, LLC, 12	Registrant's Name & Address es and Plants II, LLC, 12208 Quinque Lane, Clifton VA 20124 DuoMax				
Ingredient Hydrogen Cyanamide					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
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Signature			Name and Title Dr. Matthew Brooks, Director		Date 3/13/08



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Dale March 3, 2008			EPA Reg No./File Symbol		Page 5 of 15
Applicant's/Registrant's Name & Address		Product			
Green Trees and Plants II, LLC, 12	2208 Quinque Lane, Clifton VA 20124		DuoMax		
Ingredient Hydrogen Cyanamide					
Guideline Reference Nürmber Guideline Study Name MRID Number Submitter Status Note					
			Ałzchem Trostberg GMBH	Old	
			Alzchem Trostberg GMBH	Old	
			Alzchem Trostberg GMBH	Old	
			Alzchem Trostberg GMBH	Old	
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			Alzchem Trostberg GMBH	Ord	
			Alzchem Trostberg GMBH	Old	
			Alzchem Trostberg GM8H	Old	
			Alzchem Trostberg GM8H	Old	
			Alzchem Trostberg GMBH	PAY	
			Alzchem Trostberg GMBH	PAY	
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			Alzchem Trostberg GMBH	PAY	
Signature			Name and Title	<del></del>	Date
			Dr. Matthew Brooks, Director		3/13/08

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(a) to pay compensation in accordance with FIFRA sections 3(c)(1)(F) and/or 3(c)(2)(B), and (b) to commence negotiations to determine the amount and terms of compensation, if any,

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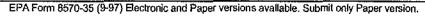
	D	ATA MATRIX			
Date March 13, 2008	Date March 13, 2008			EPA Reg No./File Symbol	
		Product DuoMax			
Ingredient Hydrogen Cyanamide					
Guideline Reference Number	Guidelirie Study Name	MRID Number	Submitter	Status	Note
163-1	Adsorption/Desorption in Soil	42178414	Alzchem Trostberg GMBH	Old	
163-1	Soil Column Leaching	42178415	Alzchem Trostberg GMBH	Old	
164-1	Soil Dissipation	00148015	Alzchem Trostberg GMBH	Old	
164-1	Soil Dissipation	00148018	Alzchem Trostberg GMBH	Old	
164-1	Fteld Soil Dissipation of Dormex	42178416	Alzchem Trostberg GMBH	Old	
132-1	Dislodgeable Foliar Residue	42178408	Alzchem Trostberg GMBH	Old	
202-1	Drift Concentration from Grapevine Applications	42178424	Alzchem Trostberg GMBH	Old	
71-4	Reproductive effects on bobwhite quail	45797201	Alzchem Trostberg GMBH	PAY	
122-1	Effects of Cyanamide on nontarget plants	45380701	Alzchem Trostberg GMBH	PAY	
122-1	Seedfing Emergence	45380702	Alzchem Trostberg GMBH	PAY	
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122-2	96 hr algal inhibition	45406602	Alzchem Trostberg GMBH	PAY	
162-4	Aerobic Aquatic Degradation	45382202	Alzchem Trostberg GMBH	PAY	
Signature		· · · · · · · · · · · · · · · · · · ·	Name and Title		Date
			Dr. Matthew Brooks, Director		3/13f08



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			——————————————————————————————————————	***************************************	
<u>.</u>		DATA MATRIX			
Date March 13, 2008	eate March 13, 2008		EPA Reg No./Fife Symbot		Page 7 of 15
Applicant's/Registrant's Name & Ad	ddress		Product		
Green Trees and Plants II, LLC, 12	reen Trees and Plants II, LLC, 12208 Quinque Lane, Clifton VA 20124		DuoMax		
ngredient Hydrogen Cyanamide					
Guldefine Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Alzchem Trostberg GMBH	Old	
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Note: If additional explanation is needed, enter a footnote number in this column and attach the corresponding explanation.



#### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 401 M Street, S.W. WASHINGTON, D.C. 20460

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	<u> </u>	ATA MATRIX			
Date March 13, 2008	Date March 13, 2008			EPA Reg No./File Symbol	
Appticant's/Registrant's Name & Address Green Trees and Plants II, LLC, 12208 Quinque Lane, Clifton VA 20124		Product DuoMax			
Ingredient Hydrogen Cyanamide					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
163-1	Adsorption/Desorption in Soil	42178414	Alzchem Trostberg GMBH	Old	
163-1	Soil Column Leaching	42178415	Alzchem Trostberg GMBH	Old	
164-1	Soit Dissipation	00148015	Atzchem Trostberg GMBH	Old	
164-1	Soil Dissipation	00148018	Alzchem Trostberg GMBH	ОМ	
164-1	Field Soil Dissipation of Dormex	42178416	Alzchem Trostberg GMBH	Old	
132-1	Dislodgeable Follar Residue	42178408	Alzchem Trostberg GMBH	Otd	
202-1	Drift Concentration from Grapevine Applications	42178424	Alzchem Trostberg GMBH	Old	
71-4	Reproductive effects on bobwhite quail	45797201	Atzchem Trostberg GMBH	PAY	
122-1	Effects of Cyanamide on nontarget plants	45380701	Atzchem Trostberg GMBH	PAY	
122-1	Seedling Emergence	45380702	Alzchem Trostberg GMBH	PAY	
122-2	Algat Growth Inhibition	45382201	Alzchem Trostberg GMBH	PAY	
122-2	96 hr Algal Inhibitton	45406601	Alzchem Trostberg GMBH	PAY	
122-2	96 hr atgal inhibition	45406602	Alzchem Trostberg GMBH	PAY	
162-4	Aerobic Aquatic Degradation	45382202	Alzchem Trostberg GMBH	PAY	
Signature			Name and Title Dr. Matthew Brooks, Director		Dale 3/13/08





#### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 401 M Street, S.W. -WASHINGTON, D.C. 20460

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send the form to this address.				······································	·····
		DATA MATRIX	•		
Date March 13, 2008		EPA Reg No./File Symbot		Page 7 of 15	
Applicant's/Registrant's Name & Address			Product		
Green Trees and Plants II, LLC, 12208 Quinque Lane, Clifton VA 20124		DuoMax			
ngredient Hydrogen Cyanamide					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Alzchem Trostberg GMBH	Old	
			Aizchem Trostberg GMBH	Old	
			Alzchem Trostberg GMBH	Old	
			Alzchem Trostberg GMBH	Old	
			Alzchem Trostberg GMBH	Off	
			Atzchem Trostberg GMBH	Old	
			Alzchem Trostberg GMBH	Old	
			Alzchem Trostberg GMBH	PAY	
			Alzchem Troslberg GMBH	PAY	
			Alzchem Trostberg GMBH	PAY	
			Alzchem Trostberg GMBH	PAY	
			Alzchem Trostberg GMBH	PAY	
			Alzchem Trostberg GMBH	PAY	****
			Alzchem Trostberg GMBH	PAY	
Signature			Name and Title		Date
			Dr. Matthew Brooks, Director		3/13/08

#### INSTRUCTIONS FOR DATA MATRIX

INSTRUCTIONS: Identify all data submitted or cited and all submitters from whom permission has been received or to whom offers to pay have been sent by entering sufficient information in the attached matrix (photocopy and attach additional pages as necessary). Complete all columns; omission of essential information will delay approval of the registration/reregistration. On each page enter the date, Applicant's/Registrant's name, EPA Registration Number or application file symbol of the product, ingredient, page number, and total number of pages.

The Data Compensation Form entitled "Certification with Respect to Citation of Data" and the Data Matrix will be publicly available, except for the Guideline Reference Number, Guideline Study Name, and MRID Number columns after the registration/reregistration of this product has been granted or once this form is received in response to a Data-Call-In Notice. However, the Information in the Guideline Reference Number, Guideline Study Name, and MRID Number columns is available through the Freedom of Information Act in association with the EPA Registration Number.

Ingredient: Identify the active ingredient(s) in this product for which data are cited. The active ingredient(s) are to be identified by entering the chemical name and the CAS registry number. Begin a new page for each separate active Ingredient for which data are cited. If bridging data from a related chemical or representative test compound are cited, enter the identity of that chemical/representative test compound Including the EPA Registration Number/File Symbol if appropriate.

If the cite-all method is used for all data supporting this particular ingredient, enter "CITE-ALL" in the Guideline Reference Number column and leave the Guideline Study Name column blank. If the cite-all method is used for a particular Guideline Reference Number enter "CITE-ALL" in the MRID Number column on the line for that Guideline Reference Number. In either case, enter all submitters to whom offers to pay have been sent on subsequent lines. [Note: If the selective method of support is used and written authorization (tetter of permission) is provided, the individual Guideline Reference Number, Guideline Study Name, and MRID Number columns must still be completed.) Otherwise:

Guideline Reference Number: Enter on separate lines in numerical order the Guideline Reference Numbers from 40 CFR Part 158 for all studies cited to support the registration/reregistration for this ingredient.

Guideline Study Name: For each Guideline Reference Number clied, enter the corresponding Guideline Study Name.

MRID Number: For each inclividual study cited in support of a Guideline Reference Number and Guideline Study Name, enter the Master Record Identification (MRID) Number listed in the Pesticide Document Management System (PDMS). Enter only one MRID Number on each line. Note that more than one MRID Number may be required per Guideline Reference Number. Note: Occasionally a study required to maintain a registration/reregistration is not associated with a Guideline Reference Number and Guideline Study Name. In such case, enter the MRID Number(s) for the study(ies).

<u>Submitter:</u> Using the most recent Data Submitters List, identify the Original Data Submitter with their current address for each study cited. The EPA assigned company number or other abbreviation may be used. Clearly explain any variations (alternate addresses, data owners not on the Data Submitters List, etc.) in footnotes to this table.

Status: Enter one of the following codes for each study cited, as appropriate:

OWN: I am the Original Data Submitter for this study.

EXC: I have obtained written permission of the Original Data Submitter to cite this exclusive-use study in support of this application.

PER: I have obtained the permission of the Original Data Submitter to use this study in support of this application,

OLD: The study was submitted more than 15 years ago and all periods of compensation have expired.

PL: The study is in the public literature.

PAY: I have notified in writing the Original Data Submitter or, if the cite-all method is used, all companies listed in the most current Data Submitters List for this ingredient, and have offered

(a) to pay compensation in accordance with FIFRA sections 3(c)(1)(F) and/or 3(c)(2)(B), and (b) to commence negotiations to determine the amount and terms of compensation, if any,

to be paid for the use of the study(ies).

GAP: This Guideline data requirement is a data gap as defined in 40 CFR sections 152.83(a) and 152.96.

FOR; I am taking the formulator's exemption for this ingredient only. Other columns of this line should be marked "NA". However, if this product is to be registered/reregistered for additional

uses for which the purchased EPA registered ingredient is not supported, additional data must be submitted or cited here to support those uses.

Note: If additional explanation is needed, enter a footnote number in this column and attach the corresponding explanation.



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Description of quality control procedures.					
Identity of the source of product ingredients.					
Sales or other commercial/financial information.					
A draft product label.					
The product confidential statement of formula.					
Information about a pending registration action.					
FIFRA registration data.					
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## Recommendation of Division Directors Negotiated Due Dates

Decision#: D379325 | File Symbol: 84374-R | Petition #: N/A

Fee Category: R31 PRIA Decision Time Frame: 6 months

Submitted by: John Bazuin | Branch: RD/FB | Date: 2/29/2008

Company: Green Trees and Plants, LLC

Original Due Date: 1/27/2008 Proposed New Due Date: 3/28/2008

Previous Negotiated Due Dates: 2/29/2008

Is the "Fix" In-house? No If Not, Date "Fix" Expected: Not yet certain

Issue (describe in detail): The registrant is using the Selective method of data compensation but their Data Matrix lists only old, noncompensable studies. Newer studies that have been required by the Agency should also be present on the matrix and some older, compensable and noncompensible studies may also need to be added. In addition, on Jan. 17, 2008 an agent for the principal Hydrogen Cyanamide company, AlzChem Trostberg GmbH, petitioned the Agency to cancel or deny the registration of the subject product on the grounds that Green Trees and Plants had not approached them with an offer to pay for a number of both newer and older studies (all specifically listed in the petition). Green Trees and Plants therefore requested an extension of the PRIA Due Date until the end of February 2008 to allow time for the data compensation issues to be worked out. However, near the end of February a few study-specific data compensation issues are still not fully resolved and Michele Knorr in the Office of General Council has informed Fungicide Branch that she will require more time to harmonize her response to the above AlzChem Trostberg GmbH petition with our registration of the subject product (assuming, as seems likely, that the last data compensation issues can be worked out). The few remaining study-specific data compensation issues have to do with whether several worker exposure studies were required by the Agency as opposed to some other entity (California, in this case), and whether several of the studies were acceptable or not. Green Trees and Plants believes that they should not have to pay for studies that were not required and/or that were not accepted by the Agency, so has requested further research on our part.

Summary of Deficiency Type(s): Other: Selective data compensation but a Data Matrix that is missing studies which may be required; harmonization of the Office of General Council response to a cancel/deny registration petition concerning the subject product with registration of the product.

Describe Interactions With the Company (describe when contacted and company's response including response to previous negotiated due dates): The registrant's agent was contacted on Jan. 17, 2008 concerning the data compensation problems and possible resolutions of them. At that time he indicated a willingness to extend the PRIA Due Date to Feb. 29, 2008, if this was acceptable to his client. On the same day Wiley Rein LLP, the attorney for AlzChem Trostberg GmbH, filed a Petition to Cancel or Deny the registration of 84374-R with the Agency and the agent for Green Trees and Plants. This petition was also discussed with Green Trees and Plants' agent on Jan. 17. On Jan. 22, 2008 the agent for Green Trees and Plants requested the agreed-upon extension and had the company do the same. On Feb. 27, 2008 the registrant's agent was contacted about the remaining data compensation issues. On Feb. 28, 2008 the registrant's agent was additionally informed of the need to coordinate the response to the cancel/deny registration petition with registration of the product. At that time the registrant's agent requested that the Agency further research the requirement background and acceptability of several specific studies and also verbally agreed to an additional, 30-day extension of the PRIA Due Date. Late on Feb. 28, 2008 a request for extension of the PRIA Due Date to Mar. 28, 2008 was received from the registrant's agent.

Was a "75-day Letter" Sent? Yes, a 75-day letter was sent on Jan. 25, 2008

Rationale for Proposed Due Date: To allow adequate time for the Agency to resolve remaining data compensation issues for a few specific studies that may or may not need to be added to the Data Matrix for 84374-R and then complete the registration in harmony with the Office of General Council's response to the AlzChem Trostberg GmbH Petition to Deny or Cancel this registration.

Registrant Notified That This is the Last Negotiation? Not Applicable

Approve:

Disapproved, Action to be Taken:

Date:
2-29-08

ROUTING AND TRANSMITTAL SLIP			: 3/29/20	2/29/2008	
TO: (Name, office symb Agency/Post)	oi, room number, building,			·,_ ······	
1. Tony Kish					
2. Cynthia Giles-Parker Reliwn Contin				AP.	
3. Lois Rossi					
4. Marty Monell			MAN	29	
5. Cynthia Giles-Parker	(for file copies)		1000		
Action	File	]	Note and Return		
Approval	For Clearance	Per Conversati		ation	
As Requested	For Correction		Prepare Reply		
Circulate	For Your Information		See Me		
Comment			Signature		
Coordination	Justify				
Eight studi compensation requires more cancel registrati the data sup	PRIA Due Date for pending pro es are still being investigated in purposes the Office of Gene time to respond to a petition ion that was filed by the own porting the pesticidal use of I d the two activities must be h	for da rai Co to de er of I	ata uncii eny or most of igen		
clearances, and similar a		rrenc	es, dispos	als,	
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John Baffilis 2 9 2008			S-7316 Phone No.		
9633			30S- <b>738</b> 1		

Green Trees & Plants, LLC. 250 Lawrence Street Marietta, GA 30060

Date: May 1, 2007

To Whom It May Concern

Green Trees and Plants LLC authorizes Ag-Chem Consulting to act on our behalf for regulatory matters involving the EPA and State Agencies for its pesticide products.

Dennis R. Kristof

President

122

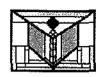
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FIFRA registration data.					
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Recommendation of Division Directors Negotiated Due Dates					
Decision#: D379325	Decision#: D379325 File Symbol: 84374-R Petition #: N/A				
Fee Category: R31		PRIA Decision Time Frame: 6 months			
Submitted by: John Bazuin		Branch: RD/FB	Date: 1/24/2008		
Company: Green Trees and Plants, LLC					
Original Due Date: 1/27/2008	Original Due Date: 1/27/2008 Proposed New Due Date: 2/29/2008				
Previous Negotiated Due Dates:	None				
Is the "Fix" In-house? No If Not, Date "Fix" Expected: Unknown; problem detailing is ongoing					
Issue (describe in detail): The registrant is using the Selective method of data compensation but their Data Matrix lists only old, noncompensable studies. Additional, newer, acceptable studies that have been required by the Agency should also be present on the matrix. At the same time an agent for the principal Hydrogen Cyanamide company, AlzChem Trostberg GmbH, has petitioned the Agency to cancel or deny the registration of the subject product on the grounds that Green Trees and Plants has not approached them with an offer to pay for these newer studies (which they specifically list in the petition). Green Trees and Plants has therefore requested an extension of the PRIA date until the end of February 2008 to allow time for the data compensation issues to be worked out.					
Summary of Deficiency Type(s): Other: Selective data compensation but a Data Matrix that is missing required studies.)					
Describe Interactions With the Company (describe when contacted and company's response including response to previous negotiated due dates): The registrant's agent was contacted about these problems on Jan. 17, 2008 and possible resolutions of the problem were discussed with him. He indicated a willingness to extend the PRIA due date to Feb. 29, 2008, if this was acceptable to his client. On the same day Wiley Rein LLP, the attorney for AlzChem Trostberg GmbH, filed their Petition to Cancel or Deny the registration of 84374-R with the Agency and the agent for Green Trees and Plants. On Jan. 22, 2008 the agent for Green Trees and Plants requested the agreed upon extension and had the company do the same.					
Was a "75-day Letter" Sent? A 75-day letter will be completed today.					
Rationale for Proposed Due Date: To allow adequate time for the Agency to research and specify the additional studies that must be added to the Data Matrix for 84374-R, including the studies specified as mandatory by the agent for AlzChem Trostberg GmbH in their Petition to Deny or Cancel this registration, and then complete the registration. We believe that the additional time is sufficient for this purpose.					
Registrant Notified That This is the	Last Negotiation?	Not Applicable			
Approve:	<u> </u>	Disapprove:			
If Disapproved, Action to be Taken	<i>:</i>				
OD or DOD Signature:			Date:		



Tony Kish/DC/USEPA/US 02/28/2008 05:12 PM To Cynthia Giles-Parker/DC/USEPA/US@EPA

cc John Bazuin/DC/USEPA/US@EPA

bcc

Subject Fw: Request for Extension For 84374-R

Cynthia - coming your way, friday am.

---- Forwarded by Tony Kish/DC/USEPA/US on 02/28/2008 05:11 PM ----



Matthew Brooks <mwbrooks01@yahoo.com> 02/28/2008 04:22 PM

To Tony Kish/DC/USEPA/US@EPA, John Bazuin/DC/USEPA/US@EPA

CC

Subject Request for Extension For 84374-R

Hi John and Tony

See attached. -Matt

Matthew Brooks, Ph.D. 703-266-0128 Phone 703-266-4377 Fax



mwbrooks01@yahoo.com Extension request-mar2008.pdf



(703) 266-4377 Fax

February 28, 2008

To: Tony Kish U.S. EPA Office of Pesticide Programs

Subject: Registration File Symbol: 84374-R
Request for Extension of PRIA Date for OPP Decision #D-379325

Dear Mr. Kish,

Green Trees and Plants LLC respectfully requests to extend the PRIA registration date to March 28, 2008. This extension is necessary to allow Agency review of the denial petition and ensure registration is in harmony with document.

Thank You.

Sincerely

Dr. Matthew Brooks AG-CHEM Consulting

An Authorized Representative for Green Trees and Plants LLC



## Matthew Brooks <mwbrooks01@yahoo.com> 02/28/2008 04:22 PM

To Tony Kish/DC/USEPA/US@EPA, John Bazuin/DC/USEPA/US@EPA

CC

bcc

Subject Request for Extension For 84374-R

Hi John and Tony

See attached. -Matt

Matthew Brooks, Ph.D. 703-266-0128 Phone 703-266-4377 Fax



mwbrooks01@yahoo.com Extension request-mar2008.pdf



# Matthew Brooks <mwbrooks01@yahoo.com>

02/28/2008 04:22 PM

To Tony Kish/DC/USEPA/US@EPA, John Bazuin/DC/USEPA/US@EPA

CC

bcc

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mwbrooks01@yahoo.com Extension request-mar2008.pdf



Ag-Chem Consulting
Pesticide Science and Registration
12208 Quinque Lane, Clifton VA 20124
(703) 266-0128 <u>mwbrooks01@yahoo.com</u>
(703) 266-4377 Fax

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Thank You.

Sincerely

Dr. Matthew Brooks AG-CHEM Consulting

An Authorized Representative for Green Trees and Plants LLC

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A draft product label.
The product confidential statement of formula.
Information about a pending registration action.
FIFRA registration data.
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<u>x</u> Attorney-client communication.
Claimed confidential by submitter upon submission to the Agency.
Personal privacy Information

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Thanks,
Tony Kish, Product Manager,
Team 22, Fungicide Branch;
Registration Division
703-308-9443
----- Forwarded by Tony Kish/DC/USEPA/US on 02/28/2008 09:55 AM -----

"Andreas, Eric" <EAndreas@wileyrein.com> 01/17/2008 03:28 PM

To
Brenda Mallory/DC/USEPA/US@EPA
cc
<mwbrooks@ag-chem.com>
Subject
AlzChem Trostberg's Petition to Deny Against Green Trees and Plants

Dear Ms. Mallory.

Attached is AlzChem Trostberg's petition to deny the application for registration by Green Trees and Plants for a pesticide product containing the active ingredient hydrogen cyanamide. I have sent a hard copy by certified mail to both you and Green Trees' agent Dr. Brooks. Please do not hesitate to contact me if you have any questions.

Sincerely, Eric Andreas

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Registration Division
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"Andreas, Enc" <EAndreas@wileyrein.com> 01/17/2008 03:28 PM

To
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<mwbrooks@ag-chem.com>
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Team 22, Fungicide Branch;
Registration Division
703-308-9443
----- Forwarded by Tony Kish/DC/USEPA/US on 02/28/2008 09:55 AM ----

"Andreas, Eric" <EAndreas@wileyrein.com> 01/17/2008 03:28 PM

To
Brenda Mailory/DC/USEPA/US@EPA
cc
<mwbrooks@ag-chem.com>
Subject
AlzChem Trostberg's Petition to Deny Against Green Trees and Plants

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Attached is AlzChem Trostberg's petition to deny the application for registration by Green Trees and Plants for a pesticide product containing the active ingredient hydrogen cyanamide. I have sent a hard copy by certified mail to both you and Green Trees' agent Dr. Brooks. Please do not hesitate to contact me if you have any questions.

Sincerely, Eric Andreas

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Pages 153 through 163 are not included in this copy.
The material not included contains the following type of information:
Identity of product inert ingredients.
Identity of product impurities.
Description of the product manufacturing process.
Description of quality control procedures.
Identity of the source of product ingredients.
Sales or other commercial/financial information.
A draft product label.
The product confidential statement of formula.
Information about a pending registration action.
FIFRA registration data.
The document is a duplicate of page(s)
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x Internal deliberative information.
Attorney-client communication.
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The information not included is generally considered confidential by product registrants. If you have any questions, please contact the individual who prepared the response to your request.



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1 eiejux		Account Number: 4043.1	
Company:	US HPA	Date: Sept. 28, 2001	
Company: To: From: Re:	Mr. John Bazuin	Receiving	
From:  S. R. Siemen/Terri Aul  Dormex Data Matrix Forms	Telefax Number: 103-506-1225		
	Dormex Data Matrix Forms		
		4	
<u> كالمريخ المستحم من مستحم</u>	<del></del>	<del>and from the statement of the statement</del>	

Dear John,

Attached are the Data Matrix forms for Dormex, EPA Reg. No. 54555-2. We tried not to leave any blank spaces, but were short some of the MRID numbers.

If any changes need to be made to these forms, let us know and we will make them immediately, prior to sending them to you by FedEx.

We very much appreciate all of your efforts on this products continuing registration.

Sincerely, SIEMER & ASSOCIATES, INC.

S.R. Siemer, Ph.D.
Regulatory Agent for

Degussa AG

Page 1 of 11



Tony Kish/DC/USEPA/US 01/17/2008 03:43 PM To John Bazuin/DC/USEPA/US@EPA

CC Cynthia Giles-Parker/DC/USEPA/US@EPA

pcc

Subject URGENT -- 84374-R PRIA = 1/27/08 AlzChem Trostberg's

Petition to Deny Against Green Trees and Plants

John -- We will really have to scrutinize this one before registration next week.

---- Forwarded by Tony Kish/DC/USEPA/US on 01/17/2008 03:41 PM ----



"Andreas, Eric" <EAndreas@wileyrein.com> 01/17/2008 03:28 PM

To Brenda Mallory/DC/USEPA/US@EPA

cc <mwbrooks@ag-chem.com>

Subject AizChern Trostberg's Petition to Deny Against Green Trees and Plants

Dear Ms. Mallory,

Attached is AlzChem Trostberg's petition to deny the application for registration by Green Trees and Plants for a pesticide product containing the active ingredient hydrogen cyanamide. I have sent a hard copy by certified mail to both you and Green Trees' agent Dr. Brooks. Please do not hesitate to contact me if you have any questions.

Sincerely, Eric Andreas



Eric Andreas Attorney At Law Wiley Rein LLP

1776 K Street NW
Washington, DC 20006
Tel: 202.719.7104 | Fax: 202.719.7049
Email: eandreas@wileyrein.com
www.wileyrein.com

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AlzChem Petition to Deny.PDF

### Green Trees & Plants, LLC. 250 Lawrence Street Marietta, GA 30060

January 22, 2008

To: Tony Kish
U.S. EPA
Office of Pesticide Programs

Subject: Registration File Symbol: 84374-R
Request for Extension of PRIA Date for OPP Decision #D-379325

Dear Mr. Kish,

Green Trees and Plants LLC respectfully requests to extend the PRIA registration date to February 29, 2008. This extension is necessary to submit and give the Agency proper time to review a revised data matrix for our proposed registration. We will submit the revised data matrix no later than January 24, 2008.

Thank You.

Sincerely

Dennis Kristof

President, Green Trees and Plants LLC



### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY . 401 M Street, S.W. WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 1.25 hours per rand 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completting the comments regarding burden estimate or any other especial of this collection of information, including suggestions for reducing the burden of information Management Division (2137). U.S. Environs social Protection Agency 401 M Street, S.W., Washington, DC 20480. Do not send the completed form to this widness.	necessary forms. Send
Certification with Respect to Chatton of Data	
Applicant a Registration Name, Address, and Talephone Number  Green Trees and Plants II LLC  EPA Registration Number/File 84974-R	Symbol
Active Incredient(s) and/or representative fest compoun (s). Hydrogen Cyanamide 1/19/09	
General Use Patient(s) (list all those cialmed for this product using 40 CFR Part 158)  Friedlick Hame Outmisk	
NOTE: If your product is a 100% repackaging of anyther purchased EPA registered product labeled for all the same uses on your tabe submit this form. You must submit this form. You must submit the Formulator's Extraption Statement (EPA Form 8570-27).	t, you do not need to
I am responding to a Data-Call in Notice, and have included with the form a set of companies sent offers of companies sent offers of companies sent offers of companies and the Data-Call in Notice, and have included with the form a set of companies sent offers of companies.	esa Malix form styale
SECTION I: METHOD OF DATA SUPPORT (Check one method only)	
am using the cate-all method of support, and have hrizided with this form a list of companies sant offers of compensation (the Data Matrix form under the selective method), and have inc should be used for this purpose).	a mor sky nilw pabok
BECTION II: GENERAL OFFER TO PAY	
Proquired If using the offerest method or when using the offerest option under the selective method to satisfy one or more data requirement.  I hereby offer and agree to pay compensation, it is other persons, with regard to the approval of this application, to the extent voquire.	*
SECTION III: CERTIFICATION	
I certify that this application for registration, it is form for reregistration, or this Dala-Cali-in response to supported by all data sul application for registration, the form for reregistration, or the Data-Cali-in response. In addition, if the cits all option or cits all option under indicated in Section 1, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product statistically similar product, or one or more of the large dents in this product and (2) is a type of data that would be required to be submitted and the data of approval of this application sought the initial registration of a product of Identical or sustee.	the selective method is for an identical or loat under the deax
I cartly that for each exclusive use study cled in support of this registration or reregistration, that I am the original data submittee the written permission of the original data submittee to cite that study.	y or that I have obtained
I certify that for each study cited in support of this registration or teregistration that is not an exclusive use study, either: (a) I am submitter (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of compensation have expired for the study; (c) the study is in the public literature; or (e) I have notified in writing the company that submitted offered (l) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFFICA; and (li) to commence negotiations amount and terms of compensation, if any, to be paid if if the use of the study.	eligibility for I the study and have
I certify that at all victories where an offer of compensation is required, copies of all offers to pay compensation and evidence of accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FFRA are available and will be submitted to the Agency upon request. Should the evidence to the Agency upon request. I understand that the Agency may initiate action to deny, carried or suspend the registration of my particle.	fall to produce such
I certify that the statements I have made in this torm and all attachments to it are true, accurate, and complete. I acknowingly takes or intaleading statement may be a michable by fine or imprisonment or both under applicable law.	knowledge that Bey
Signature A A Date Typed or Frinted Name and Ti	ű <del>ő</del>

A Form 6570-34 (9-97) Electronic and Paper versions subliable. Scienti only Esper varsion



Tony Kish/DC/USEPA/US 01/17/2008 05:59 PM To John Bazuin/DC/USEPA/US@EPA

CC

**DCC** 

Subject Fw: Request for Extension for Duomax registration- File Symbol 84374-R

Matt will send this on Green tree letterhead.

---- Forwarded by Tony Kish/DC/USEPA/US on 01/17/2008 05:58 PM ----



Matthew Brooks <mwbrooks01@yahoo.com> 01/17/2008 05:02 PM

To John Bazuin/DC/USEPA/US@EPA, Tony Kish/DC/USEPA/US@EPA

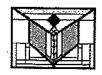
cc Dennis Kristof <dkristof43@hotmail.com>

Subject Request for Extension for Duomax registration- File Symbol 84374-R

Dear Tony,

We respectfully request an extension for OPP Decision number D-379325 for 1 month to February 29, 2008. This extension is necessary to review the additional data citations for our data matrix and potential data holder citation compensation.

Sincerely Matt Brooks An Authorized Representative for Green Trees and Plants LLC



Tony Kish/DC/USEPA/US 01/17/2008 05:59 PM To John Bazuin/DC/USEPA/US@EPA

CC

bcc

Subject Fw: Request for Extension for Duomax registration- File Symbol 84374-R

Matt will send this on Green tree letterhead.

---- Forwarded by Tony Kish/DC/USEPA/US on 01/17/2008 05:58 PM -----



Matthew Brooks <mwbrooks01@yahoo.com> 01/17/2008 05:02 PM

To John Bazuin/DC/USEPA/US@EPA, Tony Kish/DC/USEPA/US@EPA

cc Dennis Kristof <dkristof43@hotmail.com>

Subject Request for Extension for Duomax registration- File Symbol 84374-R

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Sincerely Matt Brooks An Authorized Representative for Green Trees and Plants LLC



### Matthew Brooks <mwbrooks01@yahoo.com> 01/17/2008 05:02 PM

To John Bazuin/DC/USEPA/US@EPA, Tony Kish/DC/USEPA/US@EPA

cc Dennis Kristof <dkristof43@hotmail.com>

bcc

Subject Request for Extension for Duomax registration- File Symbol 84374-R

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Sincerely Matt Brooks An Authorized Representative for Green Trees and Plants LLC



Matthew Brooks <mwbrooks01@yahoo.com> 01/17/2008 05:02 PM To John Bazuin/DC/USEPA/US@EPA, Tony Kish/DC/USEPA/US@EPA

cc Dennis Kristof <dkristof43@hotmail.com>

hcc

Subject Request for Extension for Duomax registration- File Symbol 84374-R

Dear Tony,

We respectfully request an extension for OPP Decision number D-379325 for 1 month to February 29, 2008. This extension is necessary to review the additional data citations for our data matrix and potential data holder citation compensation.

Sincerely Matt Brooks An Authorized Representative for Green Trees and Plants LLC



### Matthew Brooks <mwbrooks01@yahoo.com> 01/22/2008 04:10 PM

To John Bazuin/DC/USEPA/US@EPA

cc Tony Kish/DC/USEPA/US@EPA

bçc

Subject Extension for 84374-R

Hi John

See attached.

-Matt

Matthew Brooks, Ph.D. 703-266-0128 Phone 703-266-4377 Fax



mwbrooks01@yahoo.com Extension Forms-jan2008.pdf

Print Version

# Study Information For Ingredient 014002 / 420-04-2 / Cyanamide

MRID	Citation	Receipt Date
2164	Dickason, E.A.; Every, R.W. (1967) Alfalfa Weevil (Larval) Control Experiments1967. (Unpublished study received Mar 29, 1968 under 891-EX-14; prepared by Oregon State Univ., Entomology Dept., submitted by Hercules, Inc., Agricultural Chemicals, Wilmington, Del.; CDL:126389-B)	29-Mar- 1968
2682	Squire, S.W. (1973) Herbicides for Seeded Tomatoes, 1973: Report No. 42319, (Unpublished study received May 6, 1976 under 3125- 277; prepared by Campbell Soup Co., Ltd., ?Canada , submitted by Mobay Chemical Corp., Agricultural Chemicals Div., Kansas City, Mo.; CDL:224187-BQ)	06-May- 1976
4377	Childers, N.F. (19??) Bush berry culture: Chapter XXII. Pages 759- 780, 799-806, ~In~Modem Fruit Science. New Brunswick, N.J.: Rutgers Univ. (Also~In~unpublished submission received Nov 4, 1976 under 7E1882; submitted by Interregional Research Project No. 4, New Brunswick, N.J.; CDL:097579-A)	04-Nov- 1976
13016	Overman, A.J. (1963) Results of Soil Fumigation Tests with EP-201. (Unpublished study received on unknown date under 2139-76; pre- pared by Univ. of Florida, Gulf Coast Experiment Station, sub- mitted by Nor-Am Agricultural Products, Inc., Woodstock, Ill.; CDL:025254-C)	
15929	E.I. du Pont de Nemours & Company (1953) Du Pont 80% CMU Weed Kill- er for Weed Control in Asparagus. (Unpublished study received Jun 11, 1953 under 352-168; CDL:002765-A)	11-Jun- 1953 14-Jun- 1955
25243	Le Compte, S.B., Jr.; Alban, E.K.; Rahn, E.M.; et al. (1953) Aero Cyanate, Weedkiller-Asparagus. (Unpublished study including published data, received Aug 5, 1955 under PP0037; prepared in cooperation with Rutgers Univ., New Jersey Agricultural Experiment Station and Ohio State Univ., Agricultural Experiment Sta- tion, Dept. of Horticulture, submitted by American Cyanamid Co., Princeton, N.J.; CDL:090035-E)	05-Aug- 1955
43347	Shaffer, C.B. (1956) Cyanamide: Limited Release Toxicity Studies: Report No. 56-5. (Unpublished study received Feb 20, 1956 under unknown admin. no.; submitted by American Cyanamid Co., Prince- ton, N.J.; CDL:107739-B)	20-Feb- 1956 28-Jul- 1965
43361	American Cyanamid Company (1960?) Method for the Determination of Cyanamid on Cottonseed. Undated method. (Unpublished study received Aug 3, 1961 under unknown admin. no.; CDL:107745-A)	03-Aug- 1961
43362	American Cyanamid Company (1960) Summary of Cyanamide Residues on Ginned Cotton Seed. (Unpublished study received Aug 3, 1961 under unknown admin. no.; CDL:107745-B)	03-Aug- 1961
43363	American Cyanamid Company (1960) Metabolism of Cyanamide in the Cotton Plant. (Unpublished study received Aug 3, 1961 under unknown admin. no.; CDL:107745-C)	03-Aug- 1961
43364	American Cyanamid Company (19??) Manufacture of Cotton Seed Oil Further Arguments Supporting Absence of Cyanamid Residues. (Unpublished study received Aug 3, 1961 under unknown admin. no.; CDL:107745-D)	03-Aug- 1961
	American Cyanamid Company (1960) Reasonable Grounds for No-Residue	03-Aug-

43365	Registration of Calcium cyanamide as a Cotton Defoliant. (Unpublished study received Aug 3, 1961 under unknown admin. no.; CDL: t07745-E)	t961
69482	Sueddeutsche Kalkstickstoff-Werke AG (19??) Product Chemistry: ?Alzodef[. Includes undated method entitled: Quantitative determination of the active ingredient cyanamide and the impuri- ties dicyandiamide, urea and thiourea. (Unpublished study received Dec 20, 1977 under 35073-1; CDL:232552-A)	20-Dec- 1977
69483	Sueddeutsche Kalkstickstoff-Werke AG (1977) Residue Chemistry: ?Alzodef . (Unpublished study received Dec 20, 1977 under 35073-1; CDL:232552-B)	20-Dec- 1977
69484	Sueddeutsche Kalkstickstoff-Werke AG (1977) Environmental Chemis- try: ?Alzodef[. (Unpublished study received Dec 20, 1977 under 35073-1; CDL:232552-C)	20-Dec- 1977
69485	SKW Trostberg Aktiengesellschaft (1977) Efficacy: ?Alzodef . (Com- pilation; unpublished study, including German text, received Dec 20, f977 under 35073-1; CDL:232552-D)	20-Dec- 1977
69486	Sueddeutsche Kalkstickstoff-Werke AG (1977) Human Safety: ?Alzodef . (Unpublished study received Dec 20, 1977 under 35073-1; CDL:232552-E)	20-Dec- 1977
69487	Centraal Instituut voor Voedingsonderzoek TNO (1973) Determination of the Acute Oral Toxicity of Cyanamid in Albino Rats. (Unpub- lished study received Dec 20, 1977 under 35073-1; submitted by SKW Trostberg AG, Trostberg, West Germany; CDL:232552-F)	20-Dec- 1977
69488	Kruysse, A. (1973) Acute Inhalation Toxicity Study with SKW Cyan- amide L500 in Rats: Rapport Nr. R 4083. (Unpublished study received Dec 20, 1977 under 35073-1; prepared by Centraal Insti- tuut voor Voedingsonderzoek TNO, Netherlands, submitted by SKW Trostberg AG, Trostberg, West Germany; CDL:232552-G)	20-Dec- 1977
69489	Van Beek, L. (1974) Eye Irritation Test with SKW Cyanamid L 500 in Albino Rabbits: Rapport Nr. R 4398. (Unpublished study received Dec 20, 1977 under 35073-1; prepared by Centraal Instituut voor Voedingsonderzoek TNO, Netherlands, submitted by SKW Trostberg AG, Trostberg, West Germany; CDL:232552-H)	20-Dec- 1977
69490	Van Beek, L.; Dreef-van der Meulen, H.C. (1973) Acute Dermal Toxicity Study with SKW Cyanamid L 500 in Rabbits: Rapport Nr. R 4108. (Unpublished study received Dec 20, f977 under 35073-1; prepared by Centraal Instituut voor Voedingsonderzoek TNO, Netherlands, submitted by SKW Trostberg AG, Trostberg, West Germany; CDL:232552-I)	20-Dec- 1977
69491	Til, H.; Spanjers, M.T.; Van der Heijden, C.A. (†974) Range-finding (28-day) Toxicity Study with Cyanamid L500 in Albino Rats: Rapport Nr. R 4387. (Unpublished study received Dec 20, 1977 under 35073-†; prepared by Centraal Instituut voor Voedingsonderzoek TNO, Netherlands, submitted by SKW Trostberg AG, Trost-berg, West Germany; CDL:232552-J)	20-Dec- t977
69492	Til, H.P.; Beems, R.B.; Van der Heijden, C.A. (1975) Sub-chronic (90-day) Toxicity Study with Cyanamid L500 in Albino Rats: Rapport Nr. R 4595. (Unpublished study received Dec 20, 1977 under 35073-t; prepared by Centraal Instituut voor Voedingsondervoek TNO, Netherlands, submitted by SKW Trostberg AG, Trost- berg, West Germany; CDL:232552-K)	20-Dec- 1977
69493	Carpenter, C.P. (1953) Special Report on Range Finding Tests on Tergitol TMN: Report 16-37. (Unpublished study received on unknown date under 7E0596; prepared by Univ. of Pittsburgh, Mellon Institute of Industrial Research, Industrial Fellowship, submitted by Office of the Commissioner, unknown location; CDL: 092887-B)	
69494	Weil, C.S.; Woodside, M.D.; Bernard, J.; et al. (1962) Special Report: Results of Incorporating Tergitol TMN in the Diet of Rats for Three Months: Report 25-91. (Unpublished study re- ceived on unknown date under 7E0596; prepared by Mellon	

175"

	insti- tute of Industrial Research, Industrial Fellowship, submitted by Office of the	
	Commissioner, unknown location; CDL:092887-C)	
69495	Carpenter, C.P.; Striegel, J.A. (1960) Special Report: Range Find- ing Tests on Tergitol Nonionic TMN-10: Report 23-78. (Unpub- lished study received on unknown date under 7E0596; prepared by Univ. of Pittsburgh, Mellon Institute of Industrial Research, Industrial Fellowship, submitted by Office of the Commissioner, unknown location; CDL:092887-D)	
69496	Weil, C.S.; Woodside, M.D.; Bernard, J.R. (1968) Tergitol Nonionic TMN-10: Results of Feeding in the Diets of Rats for 7 Days: Special Report 31-118. (Unpublished study received on unknown date under 7E0596; prepared by Mellon Institute, Chemical Hygiene Fellowship, submitted by Office of the Commissioner, unknown location; CDL:092887-E)	
69497	Weil, C.S.; Woodside, M.D.; Bernard, J.R.; et al. (1968) Relation- ship between Single- peroral, One-week and Ninety-day Rat Feeding Studies: Special Report 31-35. (Unpublished study received on unknown date under 7E0596; prepared by Mellon Institute, Chemi- cal Hygiene Fellowship, submitted by Office of the Commissioner, unknown location; CDL:092887-F)	
69498	Colwell, C.E. (1968) Letter sent to Frank J. McFarland dated Sep 11, 1968 ?Proposed amendment of requirement tolerances for Tergitol 15-S Nonionic Surfactants . (Unpublished study re- ceived on unknown date under 7E0596; prepared by Union Carbide Corp., submitted by Office of Commissioner, unknown location; CDL:092887-G)	
89504	American Cyanamid Company (1955) ?Efficacy of Granular Cyanamid on Lettuce and Other Crops]. (Unpublished study, including pub-lished data, received Aug 3, 1955 under PP0036; CDL:090034-A)	03-Aug- 1955
89505	Golz, H.H. (1951?) ?Dicyandiamide Toxicity Tests on Mice, Rats and Dogs . Summary of study 090034-C. (Unpublished study received Aug 3, 1955 under PP0036; submitted by American Cyanamid Co., New York, N.Y.; CDL:090034-B)	03-Aug- 1955
104220	American Cyanamid Company (1965) Toxicity Data: ?Aero^(R)I-Cyana- mid 50 : Report 65-3. (Unpublished study received 1965 under unknown admin. no.; CDL:129443-A)	01-Jan- 1965 12-Oct- 1965
107166	American Cyanamid Co. (1960) Excerpt from Letter of August 17, 1960, from American Cyanamid Company to R. White, PRB, USDA. (Unpublished study received Oct 12, 1965 under 241-107; CDL: 130627-A)	12-Oct- 1965
107167	American Cyanamid Co. (1960) Reasonable Grounds for No-residue Registration of Calcium Cyanamide as a Cotton Defoliant. (Un- published study received Oct 12, 1965 under 241-107; CDL: 130627-C)	12-Oct- t965
110394	American Cyanamid Co. (1960) Summary of Cyanamide Residues on Ginned Cotton Seed. (Unpublished study received Oct 12, 1965 under 241-107; CDL:130627-B)	12-Oct- 1965
110395	Shaffer, C. (1956) Cyanamide: Limited Release Toxicity Studies: Report No. 56-5. (Unpublished study received Oct 12, 1965 under 241-107; submitted by American Cyanamid Co., Princeton, NJ; CDL: 130627-H)	12-Oct- 1965
148011	SKW Trostberg AG (19??) Dormex Formulation of Hydrogen Cyanamide [Product Chemistry]. Unpublished compilation, 138 p.	19-Jul- 1985
148012	SKW Trostberg AG (19??) Hydrogen Cyanamide Breakdown in Soil and Plant Metabolism. Unpublished summaries, 13 p.	19-Jul- 1985
	Crowther, E.; Richardson, H. (1932) The decomposition of calcium cyanamide in the	19-Jul-

148013	soil and its effects on germination, nitrifi- cation and soil reaction. J. Agric. Sci. 22:300-334.	1985
148014	Nommik, H. (1958) On decomposition of calcium cyanamide and dicya- namide in the soil. Acta Agriculturae Scandinavica VIII(4): 404-440. Stockholm.	19-Jul- 1985
148015	SKW Trostberg AG (†978) [Degradation of Hydrogen Cyanamide in Seve- ral Soils]. Unpublished translation of Modellversuche zum Abbau des Herbiziden Wirkstoffs Cyanamid in Drei Verschiedenen Boeden. 4 p.	19-Jul- 1985
148016	Bosh, M.; Amberger, A. (1983) Einfluss langjaehriger duengung mit verschiedenen N- formen auf ph-wert, humusfraktionen, biologi- sche aktivitaet und stickstoffdynamik einer acker-braunerde [Influence of long-term fertilizing with different forms of Ni- trogen fertilizer on pH, humic fractions, biological activity and dynamics of nitrogen of an arable brown earth]. Z. Pflanzen- ernaehr. Bodenk. 146:714-724.	19-Jul- t985
1480t7	SKW Trostberg AG (1981) Behavior of the Pesticide Alzodef in Water. Unpublished translation of Verhalten des Pflanzenbehandlungs- mittels Alzodef in Wasser. 11 p.	19-Jul- 1985
148018	Amberger, A.; Niederbudde, E. (1977) Reaction of Calcium Cyanamide and Its Metabolites at Metal Oxides in Quartz Sand and Soils. Unpublished translation of Umsetzung von Kalkstickstoff und dessen Metaboliten an Metalloxiden in Quarzsand und Boeden pre- pared by SKW Trostberg and the University of Munich. 4 p.	19-Jul- 1985
1480†9	SKW Trostberg AG (1984) Determination of Cyanamide Residues in Wa- ter. Unpublished study. 2 p.	19-Jul- 1985
148020	SKW Trostberg AG (19??) [Toxicological Summaries for Hydrogen Cyanamide]. Unpublished compilation. 2t p.	19-Jul- 1985
148021	Engel, C. (1973) Determination of the Acute Oral Toxicity of Cyana- mid in Albino Rats. Unpublished study prepared by Central In- stitute for Nutrition and Food Research TNO, Zeist. 2 p.	19-Jul- t985
t48022	Van Beek, L; Dreef-Van der Mewen, H. (1973) Acute Dermal Toxicity Study with SKW Cyanamid L 500 in Rabbits: Report No. R 4 t08. Unpublished study prepared by Central Institute for Nutrition and Food Research TNO, Zeist. 8 p.	19-Jul- 1985
148023	Kruysse, A. (1973) Acute Inhalation Toxicity Study with SKW Cyana- mid L500 in Rats: Report No. R 4083. Unpublished study prepared by Central Institute for Nutrition and Food Research TNO, Zeist. 2 p.	19-Jul- 1985
148024	Van Beek, L. (1974) Eye Irritation Test with SKW Cyanamid L 500 in Albino Rabbits: Report No. R 4398. Unpublished study prepared by Central Institute for Nutrition and Food Research TNO, Zeist. 2 p.	19-Jul- 1985
148025	VanBeek, L. (1984) Primary Skin Irritation Tests with Three Aqueous Dilutions of Alzodef in Albino Rabbits: Report No. V84.090/2300- 61. Unpublished study prepared by Central Institute For Nutri- tion and Food Research TNO. 4 p.	19-Jul- 1985
148026	Til, H.; Veldhuysen, D. (1982) Sensitization Test With SKW-Cyanamid F 1000 in Guinea Pigs: Report No. V. 82.096/220063. Unpublished study prepared by Central Institute for Nutrition and Food Research TNO. 16 p.	19-Jul- t985
148027	Til, H.; Spanjers, M.; Van der Heijden, C. (1974) Range-finding (28 day) Toxicity Study with Cyanamid L 500 in Albino Rats: Report No. R 4387. Unpublished study prepared by Central Insti- tute for Nutrition And Food Research TNO. 6 p.	19-Jul- 1985
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	43866901	Siemer, S. (1995) A Discussion of the Degradation of Hydrogen Cyanamide in Soil and Water: Lab Project Number: 954043.1. Unpublished study prepared by Siemer & Associates, Inc. 23 p.	06-Dec- 1995	
	43866902	Atkins, E. (1989) Bee Adult Toxicity Dusting Test: (Dormex 4.0 SL): Lab Project Number: 492. Unpublished study prepared by University of California, Riverside. 26 p.	06-Dec- t995	
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اسر	44076700	SKW Trostberg AG. (1996) Submission of Toxicity Data in Support of the Amended Registration for Dormex. Transmittal of 2 Studies.	05-Aug- 1996	
	44076701	Rhodes, J.; O'Brien, K. (1995) Early Life-Stage Toxicity of Hydrogen Cyanamide to the Rainbow Trout (Oncorhynchus myklss) Under Flow-Through Conditions: Final Report: Lab Project Number: 41943: FIFRA 72-4 RBT. Unpublished study prepared by ABC Labs., Inc. 297 p.	05-Aug- 1996	
	44076702	Murrell, H.; Leak, T. (1995) Chronic Toxicity of Hydrogen Cyanamide to Daphnia magna Under Flow-Through Test Conditions: Final Report: Lab Project Number: 41942: ABC 41942: FIFRA E-72-4-B. Unpublished study prepared by ABC Labs., Inc. 121 p.	05-Aug- 1996	
	44804700	SKW Trostberg Ag (1999) Submission of Toxicity and Product Chemistry Data in Support of the Registration of Dormex. Transmittal of 4 Studies.	19-Apr- 1999	
	44804701	Kendall, T.; Nixon, W. (1998) Analytical Method Verification for the Determination of Hydrogen Cyanamide Residues in Saltwater: Final Report: Lab Project Number: 248C-101. Unpublished study prepared by Wildlife International Ltd. 27 p.	19-Apr- 1999	
•		Gettmann, W.; Drottar, K.; Kruegar, H. (1998) Hydrogen Cyanamide: A 96-Hour Flow- Through Acute Toxicity Test with the Sheepshead Minnow (Cyprinodon variegatus):	19-Apr-	

	44804702	Final Report: Lab Project Number: 248A-103. Unpublished study prepared by Wildlife International Ltd. 41 p.	t999	
	44804703	Gettmann, W.; Drottar, K.; Kruegar, H. (1998) Hydrogen Cyanamide: A 96-Hour Flow- Through Acute Toxicity Test with the Saltwater Mysid (Mysidopsis bahia): Final Report: Lab Project Number: 248A-102. Unpublished study prepared by Wildlife International Ltd. 42 p.	19-Apr- 1999	
:	44804704	Gettmann, W.; Drottar, K.; Kruegar, H. (1998) Hydrogen Cyanamide: A 96-Hour Shell Deposition Test with the Eastern Oyster (Crassostrea virginica): Final Report: Lab Project Number: 248A-104. Unpublished study prepared by Wildlife International Ltd. 40 p.	19-Apr- 1999	
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	45354400	SKW Trostberg AG (2001) Submission of Environmental Fate, Toxicity and Risk Assessment Data in Support of the Registration of Dormex. Transmittal of 1 Study.	16-Mar- 2001	
	45354401	Siemer, S. (2001) Response to EFED Document Dated March 16, 1999 for Dormex. Unpublished study prepared by Siemer & Associates, Inc. 290 p.	16-Mar- 2001	
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	45365701	Siemer, S. (1995) The Evaluation of Worker Exposure During Loading and Spray Application of Dormex to Dormant Grapevines: Lab Project Number: 924043.1.15-1. Unpublished study prepared by Siemer & Associates, Inc. and SKW Trostberg AG. 732 p.	22-Mar- 2001	
	45380700	SKW Trostberg AG (2001) Submission of Toxicity Data in Support of the Registration of Dormex. Transmittal of 2 Studies.	17-Apr- 2001	<u>ر</u>
	45380701	Meister, A. (2000) Effects of Cyanamide L 500 on the Vegetative Nontarget Plant Species: Tier I: Vegetative Vigor Limit Test: Final Report: Lab Project Number: 7042087: 851-002. Unpublished study prepared by Institut fur Biologische Analytik und Consulting IBACON GmbH. 64 p. {OPPTS 850,4150)	t7-Apr- 2001	
	45380702	Meister, A. (2000) Effects of Cyanamide L 500 on the Seedling Emergence of Nontarget Plant Species: Tier I: Seedling Emergence Limit Test: Final Report: Lab Project Number: 7041086: 851-001. Unpublished study prepared by Institut fur Biologische Analytik und Consulting IBACON GmbH. 89 p. {OPPTS 850.4100}	17-Apr- 2001	
	45382200	SKW Trostberg AG (2001) Submission of Environmental Fate and Toxicity Data in Support of the Registration of Dormex. Transmittal of 2 Studies.	18-Apr- 2001	
	45382201	Hertl, J. (2000) Toxicity of SKW Cyanamide L 500 to Anabaena flos-aquae in an Algal Growth Inhibition Test: Final Report: Lab Project Number: 6677210. Unpublished study prepared by Institut fur Biologische Analytik und Consulting (BACON GmbH. 78 p.	18-Apr- 2001	
	45382202	Volkl, S. (2000) (Carbon 14)-Cyanamide Route and Rate of Degradation in Aerobic Aquatic Systems: Lab Project Number: 744952. Unpublished study prepared by RCC, Ltd. 177 p.	18-Apr- 2001	
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	45406601	Seyfried, B. (2000) Toxicity of Cyanamide L 500 to Pseudokirchneriella subcapitata (Formerly Selenastrum capricornutum) in a 96-Hour Algal Growth Inhibition Test: Lab Project Number: 744963. Unpublished study prepared by RCC Ltd. 76 p. {OPPTS	18-Apr-\ 2001	

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a Growth Inhibition Test: Final Report: Lab Project Number: 6679240. Unpublish		Hertl, J. (2000) Toxicity of SKW Cyanamide L 500 to the Aquatic Plant Lemna gibba in a Growth Inhibition Test: Final Report: Lab Project Number: 6679240. Unpublished study prepared by Institut fur Biologische Analytik und Consulting IBACON GmbH. 76 p. {OPPTS 850.4400}	18-Apr- 2001
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	45407401	Hicks, S. (1998) The Evaluation of Spray Applicator Exposure During Airblast Spray Application of Dormex to Dormant Fruit Trees: Lab Project Number: 952043.15: 954043.15. Unpublished study prepared by Siemer & Associates, Inc. 1280 p.	22-Mar- 2001
	45407402	Siemer, S. (1990) The Determination of N-acetylcyanamide in Urine of Workers Exposed to Dormex, as a Measure of Exposure: Lab Project Number: 884043.15-2. Unpublished study prepared by Siemer & Associates, Inc. 940 p.	22-Mar- 2001
	45407403	Siemer, S. (1988) Dormex Application to Dormant GrapevineWorker Exposure; Mixer/Loader, Applicator, Supervisor, Soil Surface Dissipation: Lab Project Number: 874043.15: TTL.PG2/4043.15. Unpublished study prepared by Siemer & Associates, Inc. 1596 p.	22-Mar- 2001
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*	4579740t	Huang, M. (2002) Uptake of (Carbon 14)-(Inert Ingredient) Residues in Soil by Rotational Crops Under Flooded Confined Conditions: Lab Project Number: 602CA. Unpublished study prepared by Bayer CropScience. 28 p. {OPPTS 860.1850}	01-Nov- 2002
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	46280301	Cochran, R. (1993) Hydrogen Cyanamide: Risk Characterization Document. Unpublished study prepared by California Dept. of Pesticide Regulation. 81 p.	24-May- 2004
*	46280302	Ross, J. (2002) Hydrogen Cyanamide: Evaluation of Potential Vineyard and Fruit Tree Applicator Exposures While Using Personal Equipment and Engineering Controls. Project Number: 01SAS t01/R11. Unpublished study prepared by Infoscientific.Com, Inc. 68 p.	24-May- 2004
	46376000	Zhejiang Tide CropScience Co., Ltd. (2004) Submission of Product Chemistry Data in Support of the Application for Registration of Krop-Max. Transmittal of 3 Studies.	01-Oct- 2004
	46376001	Kay, J.; Kellogg, M. (2004) Product Identity and Composition, Description of the Materials Used, Description of the Production Process, Discussion of the Formation of Impurities, and Certified Limits for Krop-Max. Project Number: TI/20040 t. Unpublished study prepared by Zhegiang Crop Science Co., Ltd. 36 p.	01-Oct- 2004
	46376002	Wang, Q. (2004) The Qualitative and Quantitative Analysis of Technical Cyanamide. Project Number: Tl/200402. Unpublished study prepared by Institute of Elemento- Organic Chemistry, 31 p.	01-Oct- 2004
	46376003	Sikod, B. (2004) Product Chemistry: End-Use Product: Hydrogen Cyanamide 50% Solution: Final Report. Project Number: 8362/04. Unpublished study prepared by Stillmeadow, Inc. 12 p.	01-Oct- 2004

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Brooks, M. (2007) DuoMax, Product Chemistry, Group A: Product Identity, Composition and Analytical Test Guidelines and Group B: Physical and Chemical Properties Test Guidelines. Project Number: GTP/002. Unpublished study prepared by Ag-Chem Consulting. 19 p.	18-May- 2007
	Registration of Dormex. Transmittal of 1 Study.  Ross, J.; Driver, J. (2006) Hydrogen Cyanamide: Comment on EPA's Review of Registrant Request for Label Change Involving Personal Protective Equipment and Engineering Controls. Project Number: 06BlO101/R1. Unpublished study prepared by Infoscientific.com, Inc. 64 p.  Green Trees and Plants, LLC (2007) Submission of Product Chemistry Data in Support of the Application for Registration of Duomax. Transmittal of 2 Studies.  Brooks, M. (2007) Hydrogen Cyanamide, Product Chemistry, Group A: Product Identity, Composition and Analytical Test Guidelines and Group B: Physical and Chemical Properties Test Guidelines. Project Number: GTP/001. Unpublished study prepared by Ag-Chem Consulting. 23 p.  Brooks, M. (2007) DuoMax, Product Chemistry, Group A: Product Identity, Composition and Analytical Test Guidelines and Group B: Physical and Chemical Properties Test Guidelines. Project Number: GTP/002. Unpublished study prepared by Ag-Chem

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Last updated on February 4, 2004, Version 1.4 http://dcopp10gas01:7777/pls/prism10p

## Green Trees & Plants, LLC. 250 Lawrence Street Marietta, GA 30060

January 22, 2008

To: Tony Kish
U.S. EPA
Office of Pesticide Programs

Subject: Registration File Symbol: 84374-R
Request for Extension of PRIA Date for OPP Decision #D-379325

Dear Mr. Kish,

Green Trees and Plants LLC respectfully requests to extend the PRIA registration date to February 29, 2008. This extension is necessary to submit and give the Agency proper time to review a revised data matrix for our proposed registration. We will submit the revised data matrix no later than January 24, 2008.

Thank You.

Sincerely

Dennis Knstot

President, Green Trees and Plants LLC

Form Approved CM9 No. 2070-0060



## UNITE ) STATES ENVIRONMENTAL PROTECTION AGENCY 401 M Street, 5.W. WASHINGTON D.C. 20480

WASHINGTON, D.C. 20460					
Paperwork Reduction Act Notice: The public reporting funders for this collection of information is estimated to average 1.25 hours per response for registration and 0.25 hours per response for recipitation and special review activities, including time for reading the instructions and completing the necessary forms. Servicoments requesting burders estimate or any other aspect of this collection of information, including suggestions for reducing the burders to: Director. OPPE information Management Division (2137); U.S. Environ vental Protection Agency, 401 M Sepet, S.W., Washington, DC 20480.  Do not send the completed form to this address.					
Certification with Respec	t to Citation of	Data			
Applicant's/Registrent's Name, Address, and Telephone Number Green Trees and Plants (LLCC					
Active incredient(s) and/or representative lest compount(s) Hydrogen Cyanamide		Deto 1/18/26			
General Use Pattern(s) (flat all those claimed for this product using 40 OFR Part 15 Temestrial Food	8)	Freduct Name Duomsix			
NOTE; If your product is a 100% repaid aging of and their purchased EPA register submit this form. You must submit the Formulator's Examption Statement (EPA For		or all the same uses on your label, you do not need to			
I am responding to a Data-Gall-In Notice, and have included with this form a be used for this purpose).	Tel of companies se	and officer of compensation (the Data Matrix form stoud)			
SECTION I: METHOD OF DATA SUP	PORT (Check one m	elliod anly):			
t am using the cate-all method of support, and have included with this form a last of companies sent offers of compensation (the Date Matrix form should be used for this purpose).	✓ under the	g the selective method of support (or the all option selective method), and have included with this form a d list of data requirements (the Data Matrix form must be			
SECTION II: GENERAL	OFFER TO PAY				
[Required It using the cite-all method or when using the cite-all option under the selection. It other persons, with regard to		워마스 하시는 경기 바로 바람들은 함께 살아보고 그 살아 보다 되었다.			
SECTION III: CER	TIFICATION				
I certify that this application for registration, of the Data-Call-In response is supported by all data submitted or olded in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the citie-all option or cite-all option under the salactive method is indicated in Section I, this application is supported by all data in the Agency's these that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product, and (2) is a type of data that would be required to be submitted under the data requirements in effect on the data of approval of this application if the application sought the initial registration of a product of identical or similar composition and stock.  I certify that for each study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the veilten permission of the original data submitter to the that study.  I certify that for each study cited in support of this registration or reregistration that is not an excitative use study, either:  (a) I have obtained the permission of the original data submitter to take the study in support of this application; (c) all periods of eligibity for compensation have expired for the study; (d) the study is in the public flurature; or (e) I have notified to veiling the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFTIA, and (f) to commence negotiations to determine the amount and terms of compensation, if any, to be paid in the case of the study.  I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I rail to product in conformity with an excit					
Signature A A A Date Typed or Printed Name slod Tille 1/22/08 Destrict President					

EPA Form 6570-34 (0-97) Electronic and Paper versions available. Submit only Paper version:



### Matthew Brooks <mwbrooks01@yahoo.com> 01/22/2008 04:10 PM

To John Bazuin/DC/USEPA/US@EPA

cc Tony Kish/DC/USEPA/US@EPA

bcc

Subject Extension for 84374-R

Hi John

See attached:

-Matt

Matthew Brooks, Ph.D. 703-266-0128 Phone 703-266-4377 Fax



mwbrooks01@yahoo.com Extension Forms-jan2008.pdf



# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

Mathew Brooks
Ag-Chem Consulting
Agent for: Green Trees and Plants, LLC
12208 Quinque Lane
Clifton, Virginia 20124

Subject:

EPA File Symbol 84374-R, Decision D379325

**DuoMax** 

Application, dated July 16, 2007, to register a new end-use product

Dear Mr. Brooks,

Our records indicate that the date by which EPA must make a decision regarding the subject application, pursuant to the Pesticide Registration Improvement Act (PRIA), is January 27, 2008. By means of this letter, the Agency is informing you that review of the application package has identified deficiencies which make the application unacceptable. These deficiencies are specified below.

This determination is not a denial of your application pursuant to section 3(c)(6) of FIFRA. Pursuant to 40 CFR 152.105, you have 75 days from the date of this letter to address the deficiencies stated in this letter or to notify the Agency when the information will be submitted to address the deficiencies.

Based on a product chemistry review performed by the Technical Review Branch (copy attached) the following deficiency has been noted.

The Certification with Respect to Citation of Data indicates that the method of data support for the pending product is Selective but the Data Matrix fails to list a number of studies that are or may be required to be cited to make this data support complete. These studies potentially include at least those in the list that begins on the following page.

	Guideline Reference	•
MRID No.	Number	Study Title
440767-01	72-4	Early Life-stage Toxicity of Hydrogen Cyanamide to the Rainbow Trout (Oncorhynchus mykiss) Under Flowthrough Conditions
440767-02	72-4	Chronic Toxicity of Hydrogen Cyanamide to Daphnia magna Under Flow-through Test Conditions
448047-02	72-3	Hydrogen Cyanamide: A 96-hour Flow-through Acute Toxicity Test with the Sheepshead Minnow (Cyprinodon variegatus)
448047-04	72-3	Hydrogen Cyanamide: A 96-hour Shell Deposition Test with the Eastern Oyster (Crassostrea virginica)
448047-03	72-3	Hydrogen Cyanamide: A 96-hour Flow-through Acute Toxicity Test with the Saltwater Mysid (Mysidopsis bahia)
457972-01	71-4	Cyanamide 50% Solution Assessment to Determine the Effects on Reproduction in the Bobwhite Quail
429064-01	85-1	Metabolism of (Carbon 14)-Hydrogen Cyanamide in Rats (Preliminary and Definitive Phases)
453807-01	122-1	Effects of Cyanamide L 500 on the Vegetative Nontarget Plant Species: Tier I: Vegetative Vigor Limit Test
453807-02	122-1	Effects of Cyanamide L 500 on the Seedling Emergence of Nontarget Plant Species: Tier I: Seedling Emergence Limit Test
453822-01	122-2	Toxicity of SKW Cyanamide L 500 to Anabaena flosaquae in an Algal Growth Inhibition Test
454066-01	122-2	Tox of Cy L 500 to Pseudokirchneriella subcapitata 96-hour Algal Inhibition
454066-02	122-2	Toxicity of Cyanamide L 500 to Pseudokirchneriella subcapitata (Formerly Selemastrum capricornutum) in a 96-hour Algal Growth Inhibition
453657-01	133-3, 133-4	The Evaluation of Worker Exposure During Loading and Spray Application of Dormex to Grapevines
454074-01	133-3, 133-4	The Evaluation of Spray Applicator Exposure During Airblast Spray Application of Dormex to Dormant Fruit Trees
454074-02	133-3,	The Determination of N-acetylcyanamide in Urine of Workers Exposed to Donnex, as a Measure of Exposure
454074-03	133-3, 133-4	Dormex Application to Dormant Grapevine - Worker Exposure; Mixer/Loader, Applicator, Supervisor, Soil Surface Dissipation
453822-02	162-4	(Carbon 14)-Cyanamide Route and Rate of Degrada- tion in Aerobic Aquatic Systems

Guideline requirements Storage Stability (GRN 830.6317) and Corrosion Characteristics (GRN 6320) are also data gaps, but can be submitted, as conditional data, following registration of the product.

You must respond to the Agency, within 75 days of the date of this letter, with a discussion or submission addressing the above deficiencies, including (as applicable) how and when they will be corrected. Additionally, it may be necessary to again renegotiate the Agency due date for this PRIA Action, depending upon the date you identify as the point when the deficiencies will be addressed or the date on which the deficiencies are, in fact, addressed.

Sincerely,

Tony Kish, Product Manager (22) Fungicide Branch Registration Division (7505P)

# 84374-R

1) TRB verieus back.
Only need is Storage
Storbility/Corrosion
Characteristics.
2) Do data comp.
3) Do labeling.

Call Matt Brooks at 9:00 q.m. on Thes.

> Do a 84374-R 75-day Letter & Due Date extension form



# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

JAN 2 5 2008

Mathew Brooks
Ag-Chem Consulting
Agent for: Green Trees and Plants, LLC
12208 Quinque Lane
Clifton, Virginia 20124

Subject:

EPA File Symbol 84374-R, Decision D379325

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448047-03	72-3	Hydrogen Cyanamide: A 96-hour Flow-through Acute Toxicity Test with the Saltwater Mysid (Mysidopsis bahia)
457972-01	71-4	Cyanamide 50% Solution Assessment to Determine the Effects on Reproduction in the Bobwhite Quail
429064-01	85-1	Metabolism of (Carbon 14)-Hydrogen Cyanamide in Rats (Preliminary and Definitive Phases)
453807-01	122-1	Effects of Cyanamide L 500 on the Vegetative Nontarget Plant Species: Tier I: Vegetative Vigor Limit Test
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Sincerely,

Tony Kish, Product Manager (22)

Fungicide Branch

Registration Division (7505P)

Dana Friedman/DC/USEPA/US 02/04/2008 t1:25 AM To Tony Kish/DC/USEPA/US@EPA

CC John Bazuin/DC/USEPA/US@EPA

bcc

Subject Re: Hydrogen Cyanamide reg review status

Hi Tony,

I was out on Friday, but received your voicemail and email, and can update you on the status of hydrogen cyanamide (below). However, I also got a call from one of the registrants on Friday, Larry Miller from Biologic, and returned his call this morning (although, I had to leave a message for him). Perhaps this is the person that contacted you on Friday as well, so I can just discuss the data requirements with him.

Hydrogen cyanamide's summary document was completed and posted to the docket on December 19th, and is currently in its 90 day comment period. *At this point*, the only data we intend to require is Tier 2 vegetative vigor and seedling emergence studies that EFED believes have already been conducted and just need to be submitted to the Agency. This is why there is only one year provided for data submission instead of 2 years. Please let me know if you have any other questions on this.

And for the petition to stop registration of 83991-G, thanks for keeping me posted. I can update the team on cyanamide at that meeting if you'd like, but not too much is going on since the comment period is open until mid next month.

Regards, Dana

Dana Friedman, Chemical Review Manager US Environmental Protection Agency Office of Pesticide Programs Special Review and Reregistation Division (p) 703/347-8827 (f) 703/308-7070 Tony Kish/DC/USEPA/US



Tony Kish/DC/USEPA/US 01/31/2008 06:45 PM

To Dana Friedman/DC/USEPA/US@EPA

cc John Bazuin/DC/USEPA/US@EPA

Subject Hydrogen Cyanamide reg review status

Hi Dana -- I just left you a VM. What is the status of this case. I have a registrant wanting to know what new data we will be requiring. Do you know this? We also received a petition to stop registration of the pending hydrogen cyanamide product 83991-G and need to meet with the team to discuss data requirements.

Thanks, Tony Kish, Product Manager, Team 22, Fungicide Branch; Registration Division 703-308-9443



Tony Kish/DC/USEPA/US 01/31/2008 06:45 PM To Dana Friedman/DC/USEPA/US@EPA

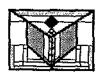
CC John Bazuin/DC/USEPA/US@EPA

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Tony Kish/DC/USEPA/US 02/04/2008 01:03 PM

To Dana Friedman/DC/USEPA/US@EPA

cc John Bazuin/DC/USEPA/US@EPA

bcc

Subject Re: Hydrogen Cyanamide reg review status



Dana Friedman/DC/USEPA/US 02/04/2008 1 t:25 AM

To Tony Kish/DC/USEPA/US@EPA

cc John Bazuin/DC/USEPA/US@EPA

Subject Re: Hydrogen Cyanamide reg review status

#### Hi Tony,

I was out on Friday, but received your voicemail and email, and can update you on the status of hydrogen cyanamide (below). However, I also got a call from one of the registrants on Friday, Larry Miller from Biologic, and returned his call this morning (although, I had to leave a message for him). Perhaps this is the person that contacted you on Friday as well, so I can just discuss the data requirements with him.

Hydrogen cyanamide's summary document was completed and posted to the docket on December 19th, and is currently in its 90 day comment period. *At this point*, the only data we intend to require is Tier 2 vegetative vigor and seedling emergence studies that EFED believes have already been conducted and just need to be submitted to the Agency. This is why there is only one year provided for data submission instead of 2 years. Please let me know if you have any other questions on this.

And for the petition to stop registration of 83991-G, thanks for keeping me posted. I can update the team on cyanamide at that meeting if you'd like, but not too much is going on since the comment period is open until mid next month.

Regards, Dana



Dana Friedman, Chemical Review Manager US Environmental Protection Agency Office of Pesticide Programs Special Review and Reregistation Division (p) 703/347-8827 (f) 703/308-7070 Tony Kish/DC/USEPA/US



Tony Kish/DC/USEPA/US 01/31/2008 06:45 PM

To Dana Friedman/DC/USEPA/US@EPA

cc John Bazuin/DC/USEPA/US@EPA

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Thanks, Tony Kish, Product Manager, Team 22, Fungicide Branch; Registration Division 703-308-9443



### Matthew Brooks <mwbrooks01@yahoo.com> 02/26/2008 11:49 PM

To John Bazuin/DC/USEPA/US@EPA, Tony KIsh/DC/USEPA/US@EPA

CC

bcc

Subject Dormex Registration

Hi John

We have to register Dormex by Friday~ Let's talk tomorrow(wednesday) about the matrix so I can get a correct one to you on Thursday and finish this. We will cite whatever we need to.

Sincerely Matt Brooks

Matthew Brooks, Ph.D. 703-266-0128 Phone 703-266-4377 Fax mwbrooks01@yahoo.com



### Matthew Brooks <mwbrooks01@yahoo.com> 02/15/2008 01:27 PM

To John Bazuin/DC/USEPA/US@EPA

CC

bcc

Subject Duomax

Hi John

Can we finish this next week? -matt

Matthew Brooks, Ph.D. 703-266-0128 Phone 703-266-4377 Fax mwbrooks01@yahoo.com

## Recommendation of Division Directors Negotiated Due Dates

Decision#: D379325 | File Symbol: 84374-R | Petition #: N/A

Fee Category: R31 | PRIA Decision Time Frame: 6 months

Submitted by: John Bazuin | Branch: RD/FB | Date: 2/28/2008

Company: Green Trees and Plants, LLC

Original Due Date: 1/27/2008 Proposed New Due Date: 3/28/2008

Previous Negotiated Due Dates: 2/29/2008

Is the "Fix" In-house? Not applicable If Not, Date "Fix" Expected: Not applicable

Issue (describe in detail): The registrant is using the Selective method of data compensation but their Data Matrix lists only old, noncompensable studies. Newer studies that have been required by the Agency should also be present on the matrix and some older, compensable and noncompensible studies may also need to be added. In addition, on Jan. 17, 2008 an agent for the principal Hydrogen Cyanamide company, AlzChem Trostberg GmbH, petitioned the Agency to cancel or deny the registration of the subject product on the grounds that Green Trees and Plants had not approached them with an offer to pay for a number of both newer and older studies (all specifically listed in the petition). Green Trees and Plants therefore requested an extension of the PRIA Due Date until the end of February 2008 to allow time for the data compensation issues to be worked out. However, near the end of February a few study-specific data compensation issues are still not fully resolved and Michele Knorr in the Office of General Council has informed Fungicide Branch that she will require more time to harmonize her response to the above AlzChem Trostberg GmbH petition with our registration of the subject product (assuming, as seems likely, that the last data compensation issues can be worked out). The few remaining study-specific data compensation issues have to do with whether several worker exposure studies were required by the Agency as opposed to some other entity (California, in this case), and whether several of the studies were acceptable or not. Green Trees and Plants believes that they should not have to pay for studies that were not required and/or that were not accepted by the Agency, so has requested further research on our part.

Summary of Deficiency Type(s): Other: Selective data compensation but a Data Matrix that is missing studies which may be required; harmonization of the Office of General Council response to a cancel/deny registration petition concerning the subject product with registration of the product.

Describe Interactions With the Company (describe when contacted and company's response including response to previous negotiated due dates): The registrant's agent was contacted on Jan. 17, 2008 concerning the data compensation problems and possible resolutions of them. At that time he indicated a willingness to extend the PRIA Due Date to Feb. 29, 2008, if this was acceptable to his client. On the same day Wiley Rein LLP, the attorney for AlzChem Trostberg GmbH, filed a Petition to Cancel or Deny the registration of 84374-R with the Agency and the agent for Green Trees and Plants. This petition was also discussed with Green Trees and Plants' agent on Jan. 17. On Jan. 22, 2008 the agent for Green Trees and Plants requested the agreed-upon extension and had the company do the same. On Feb. 27, 2008 the registrant's agent was contacted about the remaining data compensation issues. On Feb. 28, 2008 the registrant's agent was additionally informed of the need to coordinate the response to the cancel/deny registration petition with registration of the product. At that time the registrant's agent requested that the Agency further research the requirement background and acceptability of several specific studies and also verbally agreed to an additional, 30-day extension of the PRIA Due Date.

Rationale for Proposed Due Date: To allow adequate compensation issues for a few specific studies that matrix for 84374-R and then complete the registrat Council's response to the AlzChem Trostberg Gmb	nay or may not need to be added to the Data ion in harmony with the Office of General
Registrant Notified That This is the Last Negotiation	Not Applicable
Approve:	Disapprove:
If Disapproved, Action to be Taken:	·
OD or DOD Signature:	Date:

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Identity of product impurities.
Description of the product manufacturing process.
Description of quality control procedures.
Identity of the source of product ingredients.
Sales or other commercial/financial information.
A draft product label.
The product confidential statement of formula.
Information about a pending registration action.
FIFRA registration data.
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The information not included is generally considered confidential by product registrants. If you have any questions, please contact the individual who prepared the response to your request.